

EPA REGISTRATION FILE #70310-8
Vol. 1

EPA National Organic Program Labeling Request Checklist

Reviewer Name: Chris Pfeifer

RAL: Gina Burnett

Product Name: DeBug Tres (EPA Reg. No.: 70310-I (8))

Completion Date: 1/15/16

Determination: Permitted

Receipt Date: 12/3/15

#	Check list Item	Yes	No
1	Active Ingredients - Are all of the active ingredient(s) " <i>Allowed</i> " on the <u>National List</u> ?	Y	
2	Active Ingredients History - Is the active ingredient on the BPPD list of previous NOP approvals (f:/USER/SHARE/BPPD/Organic/Copy of NOP/ <u>allowableble.pdf</u> or <u>ALLOWED.xls</u>)?	Y	
3	Inert Ingredients - Are all of the inert(s) found on the August 2004 EPA list <u>4A</u> and <u>4B</u> ?	Y	
4	Inert Ingredients - Have any inert(s) been recently revoked (<u>Revoked List 4 Inerts</u>)?		N
5	Use Sites - Are all the product's use sites within the scope of the designated use patterns cited in the <i>National List</i> ?	Y	
6	Language - Is the requested label language allowable. (Acceptable language includes: " <i>For Use in Organic Production</i> "; " <i>For Organic Production</i> "; " <i>For Use in Organic Gardening</i> "; " <i>For Organic Gardening</i> "; " <i>OMRI Listed</i> "; the OMRI logo; and the three leaf EPA <u>NOP Logo</u>).	Y	
7	OMRI Certification - Does the application have a current OMRI certificate?		N
8	Comments - #1) The registered source of Cold Pressed Neem (70310-4) is NOP-compliant. It contains [REDACTED] inert and some [REDACTED]. The inert is List 4 and the [REDACTED] is not of toxicological significance. The other source for this product, Debug Aza MUP (70310-6), is also NOP-compliant. The chemical extraction is considered to be non-synthetic. There are no inerts in MP; there are no reacted products as a result of the extraction; and there are no impurities of toxicological significance. #2) The inerts are all List 4 and acceptable. All MSDS are on file; and the composition of each inert has been validated. The wide range of purity of the [REDACTED] has been adequately explained; and there are no other intentionally added ingredients in that source. #3) All use sites are within scope of the Organic Production Standard or the Organic Gardening Standard. #4) The NOP language - For Organic Production, For Organic Gardening and For Organic Turf Use - are acceptable as they are currently segregated on the sublabels. Permit NOP labeling of this product.		

This review contains **CONFIDENTIAL BUSINESS INFORMATION (CBI)**. Do not release this document to the registrant if it contains confidential information on proprietary mixes.

Program Links - National Organic Program (AMS - NOP); PR Notice 2003-1 (PR Notice 2003-1)
BPPD Guidance Document - Other Items May be Required

Pfeifer, Chris

From: shyam chari <shyam.chari@att.net>
Sent: Thursday, December 24, 2015 9:05 AM
To: Pfeifer, Chris
Subject: [REDACTED]
Attachments: 20151224143818092.pdf; ATT00001.htm

Sent from my iPhone

Begin forwarded message:

From: shyam chari <shyam.chari@att.net>
Date: December 24, 2015 at 5:51:19 AM PST
To: chris.pfeifer@epa.gov
Subject: [REDACTED]

It looks like the MSDS is kind of generic. The attached PDF document gives the exact composition from the manufacturing facility.

I hope this will clear up your question regarding the percentages.

Shyam Chari

Agro Logistic Systems Inc.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

WASHINGTON, D.C. 20460

OFFICE OF
CHEMICAL SAFETY AND
POLLUTION PREVENTION

MEMORANDUM

DATE: December 17, 2015

SUBJECT: Science Review of Section B672 Registration for Debug TRES (EPA Symbol #: 70310-I), Containing 3% of Azadirachtin and 4.7% of Neem (Margosa) Oil as its active ingredients (A.Is.). Review of CSF, Label, Product Chemistry and Toxicity

Decision Number: 502469

DP Number: 428367

EPA File Symbol Number: 70310-I

Chemical Class: Biochemical

PC Code: 121701,025006

FROM: Shenell L.T. Bolden, Biologist
BPB/BPPD (7511P)

Handwritten signature of Shenell L.T. Bolden.

THRU: Russell Jones, Ph.D, Senior Scientist
BPB/BPPD (7511P)

Handwritten signature of Russell Jones.

TO: Gina Burnett, Acting Senior Regulatory Action Leader
BPB/BPPD (7511P)

Action Requested:

On behalf of AgroLogistics, John Fournier has submitted an application for a Section B672 registration for the end use product, Debug TRES (EPA Symbol #: 70310-I), containing 3% of Azadirachtin and 4.7% of Neem (Margosa) Oil as its active ingredients (A.Is.). The product is intended for use on golf courses, turf, parks and ornamental for nematode and turf insect control.

In support of this registration, the registrant has submitted a label, basic Confidential Statements of Formula (CSF), dated 03/06/15, product chemistry (MRID: 495869-02) and data and information submission for acute toxicity studies (MRID 495869-03). BPPD has reviewed and evaluated the submissions for the registration of the end use product, Debug TRES (EPA Symbol #: 70310-I). The decisions are made to reflect the current OCSPP's policies.

Conclusions:

1. The Confidential Statement of Formula (CSF) is **ACCEPTABLE**.
2. Product Chemistry is **ACCEPTABLE**.
3. Acute Toxicity is **ACCEPTABLE**.
4. Non-Targets is **ACCEPTABLE**.

STUDY SUMMARIES

Confidential Statements of Formula (CSF)

A basic Confidential Statement of Formula (CSF), dated 03/06/15, product chemistry for the manufacturing use product, DEBUG TRES (EPA Symbol No.: 70310-I) has been submitted. The product contains 3% of Azadirachtin and 4.7% of Neem (Margosa) Oil as its active ingredients (A.Is.).

The nominal concentrations and certified limits are listed in Table 1 for the active ingredients in the end use product DEBUG TRES.

TABLE 1. Nominal CSF concentrations and certified limits for Azadirachtin and Neem (Margosa) Oil ^a					
Ingredients (CAS number)	EPA Reg, No.	Purpose	Concentration (% by weight)		
			Nominal	Upper	Lower
Active Ingredient					
Debug TGAI (5.00 %)	70310-4	Active Ingredient	4.70% (47.0 kg)	4.94% (49.40 kg)	4.47% (44.70kg)
Debug AZA MUP (11.80%)	70310-A	Active Ingredient	11.80% (118.0 kg)	12.39% (123.9 kg)	11.21% (112.1kg)

^aData from CSF 03/06/15

Physical and Chemical Characteristics

The product chemistry data for the end use product, DEBUG TRES (EPA Symbol No.: 70310-I) containing 3% of Azadirachtin and 4.7% of Neem (Margosa) Oil as its active ingredients (A.Is.). is completed. There are no reported impurities of toxicological concern. The Series 830 physical and chemical properties are given in Table 2.

TABLE 2. Physical and Chemical Properties for DEBUG TRES ^a		
Guideline Reference No./Property	Description of Result	Methods
830.6302 Color	Clear, light brown	-
830.6303 Physical State	Homogenous liquid	-
830.6304 Odor	Nutty	-
830.6315 Flammability	67°C (152.6°F)	-
830.6317 Storage Stability	2 years	-
830.6320 Corrosion Characteristics	Not corrosive to its packaging (HDPE) containers or metals	-
830.7000 pH	4.75	-
830.7100 Viscosity	132 cps	-
830.7300 Density/Relative Density/Bulk Density	0.944 no units given	-

^aData from MRID 495869-02

Product Identity and Composition

Active Ingredient:

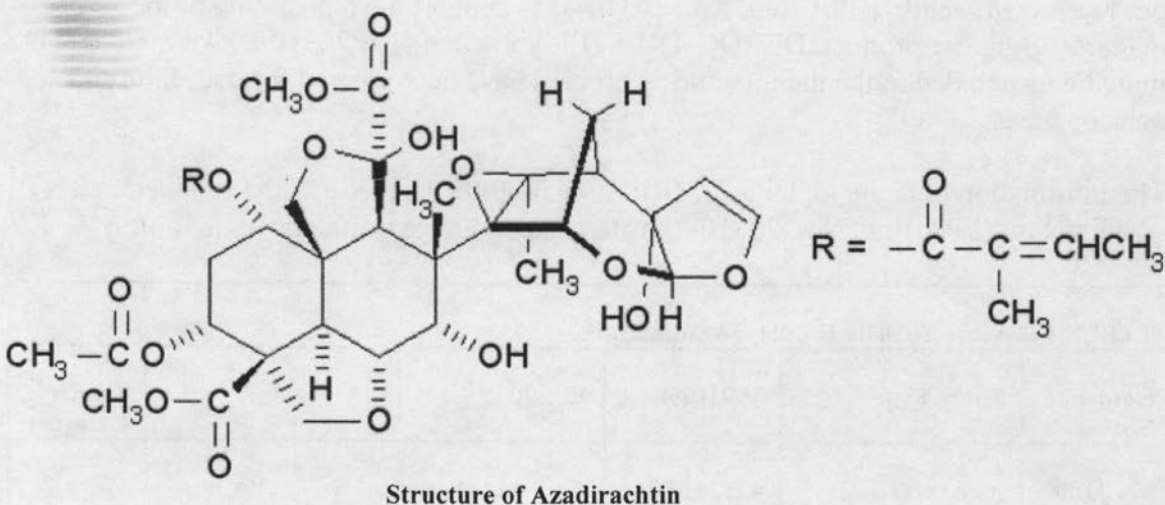
Common name: Cold Processed Neem Oil

Chemical name: Azadirachtin

CAS: 11141-17-6

Molecular Formula: C₃₅H₄₄O₁

Molecular Weight: 720.21



Common name: Cold Processed Neem Oil
Chemical name: Neem Oil (Margosa)
CAS: 8002-65-1
Molecular Formula: $C_{30}H_{36}O_6$
Molecular Weight: 492.3

Unavailable
Structure of Neem (Margosa) Oil

Description of Starting Materials (SEE CONFIDENTIAL APPENDIX)

Description of Production and Formulation Process (from email dated 12/08/2015 from John Fournier to Gina Burnett – SEE CONFIDENTIAL APPENDIX)

Discussion of the Formation of Impurities (from email dated 12/08/2015 from John Fournier to Gina Burnett – SEE CONFIDENTIAL APPENDIX)

Tier I Acute Toxicity (OPPTS 870.1100 - 1300 & 870.2400 – 2600)

No acute toxicity studies have submitted for the end use product, DEBUG TRES (EPA Symbol No.: 70310-I). The registrant proposes to use acute toxicity studies for the TGAI product, Azadirachtin (EPA Reg. No.: 70310-4) to support the registration of the manufacturing use product, DEBUG TRES (EPA Symbol No.: 70310-I). All inert ingredients detailed in the manufacturing process have been cleared for both food and non-food use.

The information of acute toxicities (MRIDs: 495869-03 using the TGAI product, Azadirachtin (EPA Reg. No.: 70310-4) as test materials are summarized in Table 3.

TABLE 3 Acute Toxicity Profile – Azadirachtin				
Guideline No.	Study Type	MRID(s)	Results	Toxicity Category
870.1100	Acute oral [rat]	425383-02 446448-10	The oral LD ₅₀ for rats was greater than 5000 mg/kg.	IV
870.1200	Acute dermal [rat]	425383-03 446448-11	LD ₅₀ = > 2000mg/kg for rats	III
870.1300	Acute inhalation [rat]	446448-12	The single exposure acute inhalation LC ₅₀ of the test substance is greater than 0.72 mg/L in rats.	IV
870.2400	Acute eye irritation [rabbit]	425383-04 446448-13	Causes moderate eye irritation following acute exposure	II

TABLE 3 Acute Toxicity Profile – Azadirachtin				
Guideline No.	Study Type	MRID(s)	Results	Toxicity Category
870.2500	Acute dermal irritation [rabbit]	425383-03 446448-11 425383-05 446448-14	Slightly irritating	IV
870.2600	Skin sensitization [guinea pig]	425383-06 446448-21	The test substance is not considered to be a contact sensitizer.	IV

Conclusions:

The acute toxicity studies for Azadirachtin are **ACCEPTABLE** to support the registration of the end use product, DEBUG TRES (EPA Symbol No.: 70310-I). Acute toxicities for the manufacturing use product, DEBUG TRES should be classified as Toxicity Category IV for acute oral toxicity, acute dermal irritation, skin sensitization and for acute inhalation; Toxicity Category III acute dermal; and Toxicity Category II for acute eye irritation. The test substance is not considered to be a contact sensitizer.

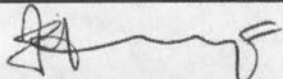
Non-Target Organisms

The studies for Non-Target Organisms are not required for this registration.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2137)U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

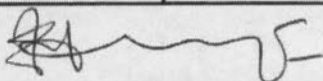
Date July 6, 2015			EPA Reg. No./File Symbol 70310-I	Page 1 of 1	
Applicant's/Registrant Name and Address Agro Logistic Systems, Inc. P.O. Box 5799 Diamond Bar, CA 91765			Product Debug Tres		
Ingredient Azadirachtin, Fats and Glyceridic Oils, Margosa					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 880.1100	Product Identity and Composition	NEW	Agro Logistic Systems, Inc.	OWN	
OPPTS 880.1200	Description of Starting Materials, Production and Formulation Processes	NEW	Agro Logistic Systems, Inc.	OWN	
OPPTS 830.1750	Certified Limits		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1100	Acute Oral Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1200	Acute Dermal Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1300	Acute Inhalation Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2400	Primary Eye Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2500	Primary Dermal Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2600	Dermal Sensitization		Agro Logistic Systems, Inc.	OWN	
Signature 			Name and Title Shyam K. Chari, President		Date July 6, 2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060

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Ingredient Azadirachtin, Fats and Glyceridic Oils, Margosa					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agro Logistic Systems, Inc.	OWN	
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			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
Signature 		Name and Title Shyam K. Chari, President		Date July 6, 2015	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

June 29, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

CERTIFIED MAIL

Mr. John Fournier
Acadia Regulatory Consulting
Authorized Agent for Agro Logistic Systems, Inc.
331 West King Road
Ithaca, NY 14850

RE: Deficiencies and Issues Noted During Preliminary 90-Day Technical Screen
Product name: DEBUG TRES
Active Ingredients: Azadirachtin; Fats and Glyceridic Oils Margosa
EPA File Symbol: 70310-I
Decision Number: 502469
PRIA Category: B672

Dear Mr. Fournier:

The Agency has completed its preliminary technical screening of your application pursuant to Section 33(f)(4)(B)(i)(II) of the Federal Insecticide, Fungicide, and Rodenticide (FIFRA) Act, as amended by the Pesticide Registration Improvement Extension Act. The Agency has determined that your application has not passed the preliminary technical screen and therefore is subject to rejection if the application is not corrected. The deficiencies are outlined in the attached confidential appendix.

In order for the review of your product to continue, you will need to correct your application to address the item(s) listed above within 10 business days of the date you received this letter. Corrections must be received by EPA by the 10th business day. EPA recommends sending your complete set of corrections by email to the contact listed below to ensure they are timely received. If studies or confidential information are being submitted by mail, a complete courtesy copy received by email by the deadline will be considered timely. If you cannot correct the application, or do not respond within 10 business days, your application will be rejected. At this time you could also choose to withdraw your application.

The Agency wants to work with you to help move your application into the next phase of the regulatory process. As Gina Burnett, Regulatory Action Leader, Biochemical Pesticides Branch, discussed with you in a telephone conversation on June 29, 2015, we hope that the deficiencies can be addressed as outlined in the confidential appendix within the given timeframe. If you have additional questions or would like to arrange a meeting or teleconference, please contact Ms. Gina Burnett at burnett.gina@epa.gov, or via phone at (703) 605-0513.

Sincerely,

A handwritten signature in dark ink, appearing to read "Linda A. Hollis". The signature is fluid and cursive, with the first name "Linda" and last name "Hollis" clearly distinguishable.

Linda A. Hollis, Chief
Biochemical
Biopesticides and Pollution Prevention Division
Office of Pesticide Programs

CONFIDENTIAL APPENDIX

Deficiencies Noted During the Technical Screen:

EPA File symbol: 70310-I

Decision No.: 502469

End-Use Product

Deficiency	Data/Information Submitted	Reason for Inadequacies	What Data/Information are Needed
880.1200 <u>description of</u> <u>starting materials,</u> <u>production and</u> <u>formulation</u> <u>process</u>	49568703	This product contains EPA File Symbol: 70310-A as a source of active ingredient. The Agency has identified significant deficiencies pertaining to the manufacturing process and discussion of formation of impurities for EPA File Symbol: 70310-A.	This product cannot move forward for review until the deficiencies in EPA File Symbol: 70310-A are resolved.

Note: At this time, your Human Health Toxicity rationales submitted with this application have past the technical screen. However, in the event that significant information changes regarding your active ingredient, these rationales may be deemed unacceptable.

Biochemical Pesticide Technical Screen

Date of Tech Screen Completion:

PASS or FAIL: FAIL

(TO BE COMPLETED BY THE RAL):

RAL and Reviewer	Gina Burnett; Shenell Bolden
File Symbol/Registration/Petition No.	70310-I
PRIA Code	<i>B672; new end-use product, registered source of AI</i>
Submission No.	965497
Decision No.	502469

<u>Label</u>				
Item:	Description:	Yes	No	N/A
a.	Restricted Use Pesticide statement (If applicable)			X
b.	Product name, brand or trademark	X		
c.	Ingredient statement correct? Microbial: strain designation Microbial: potency designation	X		
d.	"Keep Out of Reach of Children" (KOOROC) Statement	X		
e.	Signal word	X		
f.	First aid statement	X		
g.	Net contents/net weight	X		
h.	EPA Reg. No. and Establishment No.	X		
i.	Company name and address	X		
j.	Precautionary statement: hazards to human and domestic animals Microbial: dusk mask statement	X		
k.	Environmental hazards	X		
l.	Physical and chemical hazards (if app.)			X
m.	Directions for use	X		
m.	Storage and disposal	X		
o.	Warranty statement	X		
p.	Worker protection	X		
q.	Batch code	X		

RAL Comments:

None.

Inert ingredient information may be entitled to confidential treatment

(TO BE COMPLETED BY THE REVIEWER):

Notes to reviewer: 1) when listing/discussing a specific data requirement, please also list the corresponding guideline number and 2) include the appropriate MRID number when discussing a deficiency, data, etc.

Confidential Statement of Formula (CSF)				
Item:	Description:	Yes	No	N/A
a.	Concurrence with Inerts Branch assessment of inert ingredient approval on CSF?	x		
b.	CSF accurately reflects label		x	
c.	Active(s) + Inert(s) = 100%		x	
d.	Chemical names and CAS #s provided for inerts	x		
e.	Units in all applicable boxes	x		
f.	Supplier information adequately listed	x		
g.	Certified limits correct?	x		
h.	If certified limits are outside recommended range, explanation provided?			x
i.	If there are alternate formulations, are they actually alternate and not a new product?			x
Summary of deficiencies/Comments: The CSF does not accurately reflect the label for this product. The ingredients on the CSF only add up to 90.85% instead of 100% as reflected in the label				

Data Matrix-TGAI (delete table if a.i. source is registered)				
Item:	Description:	Yes	No	N/A
a.	Are all product chemistry data requirements listed?		x	
b.	Are all mammalian toxicology data requirements listed?	x		
c.	Are all nontarget organism data requirements listed?		x	
Summary of deficiencies/Comments: <ol style="list-style-type: none"> One of the A.I.s (70310-A) has inaccurate ingredient information submitted. The ingredients listed for MUP 70310-A state the make-up as azadirachtin + [REDACTED] (MRID 49586903 pg 9 schematic). However, MRID 45968703 submitted for product 70310-A states the product make-up as 25% azadirachtin + [REDACTED] impurities and [REDACTED] (pg 10). See rationale submitted in MRID 49586903 Non-target organism was not addressed with this submission. 				

Data Matrix-MP or EP

Item:	Description:	Yes	No	N/A
a.	Are all product chemistry data requirements listed?		X	
b.	Are all mammalian toxicology data requirements listed?	x		
c.	Are all nontarget organism data requirements listed?		X	
d.	Are all efficacy data listed?		x	
e.	If the a.i. is from a registered source, is the source registered for the EP's or MP's use pattern?	x		

Summary of deficiencies/Comments:

- a. MUP 70310-A used to make EP has discrepancies in product chemistry (see MUP above)
- b. Rationale submitted in MRID 49586903
- c. Non-target organisms were not addressed in this submission
- d. No efficacy data has been submitted
- e. One of the A.I.s is registered for this use pattern (70310-4)

Deficiency Table for the unregistered source of list a.i. (delete table if a.i. source is registered)

Inert ingredient information may be entitled to confidential treatment

Deficiency	Data/Information Submitted	Reason for Inadequacies	What Data/Information are Needed
List data requirement and guideline no.	List MRID No. and whether data, rationale, or waiver request were submitted.		
830.1620 description of production process			
880.1200 description of starting materials, production and formulation process	49568703	A.I. (70310-A) has inaccurate ingredient information submitted. The ingredients listed for MUP 70310-A state the make-up as azadirachtin [REDACTED] (MRID 49586903 pg 9 schematic). However, MRID 45968703 submitted for product 70310-A states the product make-up as 25% azadirachtin + [REDACTED] impurities and [REDACTED] (pg 10).	Clearly state the starting and end products. This must be consistent throughout the document and must match the CSF and the label.
880.1400 discussion of formulation of impurities			

Data Requirements-MP or EP				
Item:	Description:	Yes	No	N/A
a.	Are all product chemistry data adequate for secondary review?		x	
b.	Are all mammalian toxicology data adequate for secondary review?	x		
c.	Are all nontarget organism data adequate for secondary review?		x	
Comments: a. Please see MUP discrepancies b. Rationale submitted in MRID 49586903 c. Non-target organism data was not submitted with this package.				

Deficiency Table for EPA Reg. No./File Symbol No.:

Deficiency	Data/Information Submitted	Reason for Inadequacies	What Data/Information are Needed
List data requirement and guideline no.	List MRID No. and whether data, rationale, or waiver request were submitted.		

Tolerance/Exemption/Nonfood Determination (delete if nonfood-use or already approved for food use)	
Is this a tolerance exemption, tolerance or nonfood determination?	
Are the hazard data adequate for secondary review? If so, is there a likely endpoint?	
If there are residue, environmental fate, etc. data, do they support the petition?	
Summary of deficiencies/Comments:	



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 23, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

AGRO LOGISTIC SYSTEMS INC
PO.BOX : 5799
DIAMOND BAR, CA 91765

Report of Analysis for Compliance with PR Notice 11-03

Thank you for your submittal of 11-MAR-15. Our staff has completed a preliminary analysis of the material. The results are provided as follows:

Your submittal was found to be in full compliance with the standards for submission of data contained in PR Notice 11-03. A copy of your bibliography is enclosed, annotated with Master Record ID's (MRIDs) assigned to each document submitted. Please use these numbers in all future references to these documents. Thank you for your cooperation. If you have any questions concerning this data submission, please raise them with the cognizant Product Manager, to whom the data have been released.



Receipt for Section 3

S: 965497

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

Company: 70310 AGRO LOGISTIC SYSTEMS INC



Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 70310-I

Product Name: DEBUG TRES

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 06-Mar-2015



OPP Rec'd Date: 11-Mar-2015



Front End Date: 12-Mar-2015



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NEW REGISTRATION WITH STUDIES

New Ingredient

Request Date:

New Ingredient

Received Date:

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Print Letter

Enter More Information

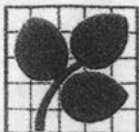
Tracking

Receipt Content

Study

CSF

View/Edit



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.
Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

 **ORIGINAL**

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

49586900

Linda Hollis, Chief, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

March 6, 2015

RE: **Application for New Product Registrations**
File Symbol 70310-A: Debug Aza MUP, PRIA Category B673
File Symbol 70310-T: Debug Optimo, PRIA Category B670
File Symbol 70310-I: Debug Tres, PRIA Category B670

Dear Ms. Hollis:

Agro Logistic Systems, Inc. (EPA Co. No. 70310), hereby submits three applications for new product registration. The first application is for a manufacturing use product, Debug Aza MUP (File Symbol 70310-A). The other two applications are for new end-use products, Debug Optimo (File Symbol 70310-T) and Debug Tres (File Symbol 70310-I).

This application fits under PRIA Category B673 for the registration of the MUP (new MUP, unregistered source of active ingredient, citation of TGAI data previously reviewed and accepted by the Agency) and B670 for the two new end use products with registered sources of active ingredients. A small business 75% waiver of the required PRIA fees is requested, and appropriate documentation is included. Enclosed you will find the following in support of each of the three applications:

- 1) Application form;
- 2) Online payment confirmation;
- 3) Small Business Waiver documentation;
- 4) Confidential Statement of Formula;
- 5) Certification with Respect to Citation of Data form;
- 6) Data Matrix, including a publicly releasable "blacked-out" version;
- 7) Five (5) copies of the product label;
- 8) Data Volumes 1 through 3 – refer to the Transmittal Document for a complete listing of data volume titles and corresponding OPPTS Guideline Numbers.
- 9) Shelf Life (Storage Stability) study

Debug TURBO



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.

Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

10) 5-Batch Analysis

Please note the following with regards to this application:

- a. **Identity of the Products.** Debug Aza MUP is a new manufacturing use product. Debug Optimo and Debug Tres are new end-use fungicide and bactericide product containing registered active ingredients and formulated with minimum risk inert ingredients. Debug Tres also contains the new Debug Aza MUP.
- b. **Product Chemistry Data.** A complete set of product chemistry data for each product is submitted with these applications – refer to Volume 2 of each product submission.
- c. **Human Health Toxicity Data.** Scientifically sound data rationales have been submitted for all human health toxicity data requirements for each product – refer to Volume 3 of each submission. Data waiver rationales are based on toxicity information available on the active ingredients, inert ingredients, and their breakdown products, as well as a discussion on potential human exposure, or lack thereof.

With this application, we believe all biochemical pesticide Tier 1 data requirements for new MUP and end-use products have been fulfilled. Please contact me if there are any questions or comments.

Respectfully,

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799

Diamond Bar, CA 91765

Tel. (714) 990-9220; email: shyam@agrologistic.com

Debug TURBO

VOLUME 1 OF 3 OF SUBMISSION
TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765

REGULATORY ACTION:

PRIA B670 Application for Registration of **Debug Tres**

TRANSMITTAL DATE:

March 6, 2015

LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	OCSPP GUIDELINE NUMBER
	1 of 3	Transmittal Document, Admin Documents	-----
49586901	2 of 3	Product Chemistry for Debug Tres	880.1100
49586902			880.1200
			830.1750
49586903	3 of 3	Response to Tier 1 Biochemical Pesticide Data Requirements for Debug Tres	870.1100
			870.1200
			870.1300
			870.2400
			870.2500
			870.2600

COMPANY NAME: Agro Logistic Systems, Inc.

COMPANY OFFICIAL:

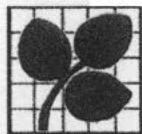


Shyam K. Chari, President

COMPANY CONTACT:

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Manufacturing process information may be entitled to confidential treatment



**AGRO
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555 W. Lambert Road, Unit - N, Brea, CA 92821.
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49789200

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Gina Burnett, Regulatory Action Leader, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

December 02, 2015

RE: **Application for New Product Registrations**
File Symbol 70310-A: Debug Aza MUP, PRIA Category B673
File Symbol 70310-T: Debug Optimo, PRIA Category B670
File Symbol 70310-I: Debug Tres, PRIA Category B670

Dear Ms. Burnett:

Please refer to your email of December 02, 2015 for the above submissions.

You have identified the following remaining corrections-

1. Debug Aza MUP- EPA Symbol 70310- A : The manufacturing process schematic should describe the [REDACTED] residue as [REDACTED] by-products as stated in the manufacturing process write-up.

Response: We have corrected the manufacturing process schematic to reflect the [REDACTED] by-products as stated in the manufacturing write up. The complete Product Chemistry Group A, Part 2 of 2 is attached with the corrections.
The Manufacturing Use Label is also attached as requested.

2. Debug Tres- EPA Symbol 70310-I: The manufacturing process schematic needs to be revised to be more clear. What is being [REDACTED] etc.

Response: We have corrected the schematic to clarify the process [REDACTED]

In addition the ingredient amounts listed in the manufacturing process of the final product on this page is corrected to add up to 100%.

Debug TURBO

Manufacturing process information may be entitled to confidential treatment



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.

Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

3. Debug Optimo- EPA Symbol 70310-T: The manufacturing process schematic needs to be revised to be more clear. What is being [REDACTED] etc.

Response: We have corrected the schematic to clarify the process [REDACTED]
[REDACTED]

In addition the ingredient amounts listed in the manufacturing process of the final product on this page is corrected to add up to 100%.

Also attached is the corrected Master Labels for Debug Tres (EPA Symbol 70310-I) and Debug Optimo (EPA Symbol 70310-T).

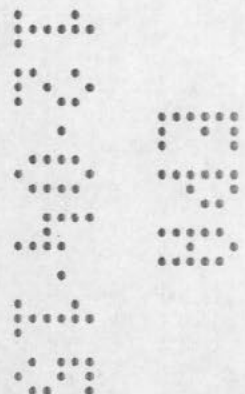
Respectfully,

Shyam K. Chari, President
Agro Logistic Systems, Inc.

P.O. Box 5799

Diamond Bar, CA 91765

Tel. (714) 990-9220; email: shyam@agrologistic.com



Debug TURBO

TRANSMITTAL DOCUMENT

Date: 12/02/2015

Company:

AGRO LOGISTIC SYSTEMS, INC
555 W. LAMBERT ROAD, UNIT-N
BREA, CA 92821
714-990-9220

Product Name/EPA Reg. #: Debug Aza MUP, Debug Optimo and Debug Tres (70310-A, 70310-T and 70310-I)

<u>MRID</u>	<u>Study No.</u>	<u>Study Title</u>
49789201	1	Group A Product chemistry for Debug Aza MUP
49789202	2	Group A Product chemistry for Debug Tres
49789203	3	Group A Product chemistry for Debug Optimo



Rejected

Study

(02



Master Label Debug®Trés

Page 1 of 6

Sub-label A: For Agriculture, Horticulture & Greenhouses, Golf Courses, Turf, & Ornamentals

Sub-label B: For Home Gardens

Emulsifiable Concentrate

**AGRICULTURAL, HORTICULTURAL, GREENHOUSE, AND OUTDOOR
DOMESTIC TERRESTRIAL PESTICIDE**

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN

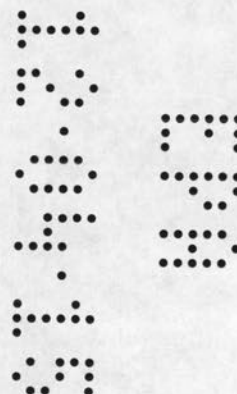
CAUTION

EPA REGISTRATION No. 70310-I
EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
U.S.A.

TEL: (714) 990-9220
e-mail: info@agrologistic.com
Website: www.agrologistic.com

Net contents: [4 Fl. Oz.]/ [8 Fl. Oz.]/ [32 Fl. Oz.]/ [1 Gal]



PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if absorbed through skin or if inhaled.
Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators, Mixers and other handlers must wear
-Coveralls

- Socks, shoes, and

-Chemical resistant gloves.

Follow manufacturer's instructions for

cleaning/maintaining PPE. If no such instructions for washables use detergent and hot water. Keep and wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

Batch No:

Manufacturing Date:

Expiry Date:

PRODUCT OF INDIA

MANUFACTURED FOR

Agro Logistic Systems, Inc.

P.O. Box 5799, Diamond Bar, CA 91765,
U.S.A.

TEL: (714) 990-9220

Website: www.agrologistic.com

EPA REGISTRATION No. 70310-I
EPA ESTABLISHMENT No.070310-IND-
002

Sub-label A: Agriculture, Horticulture, Greenhouse, Golf Courses, Turf, Parks & Ornamentals

Debug® Trés

Emulsifiable Concentrate

Antifeedant, Insect Repellent,

Insecticide, Miticide, Fungicide & Nematicide



FOR ORGANIC PRODUCTION

ACTIVE INGREDIENT:

Fats and Glyceridic

4.70%

Oils Margosa

3.00%

Azadirachtin

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN CAUTION

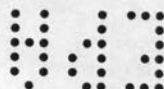
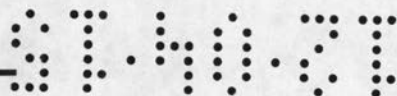
FIRST AID

If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30AM to 4:30PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

Net contents: [4 Fl. Oz]/[8 Fl. Oz]/[32 Fl. Oz]/[1 Gal]



DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is:

- Coveralls
- Chemical resistant gloves, such as barrier laminates or butyl rubber or nitrile rubber or PVC.
- Shoes and socks

NON- AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used on agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place (between 60 degrees F and 80 degrees F) away from sunlight and foodstuffs. Do not refrigerate. For Commercial Agricultural Use:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

DEBUG TRÉS
PLEASE READ THE FOLLOWING INFORMATION
CAREFULLY BEFORE USING DEBUG TRÉS

TANK MIXING:

'DEBUG TRÉS is compatible with commonly used insecticides, fungicides and foliar fertilizers. Do not use Debug Trés with Bordeaux mixture, lime sulfur or other highly alkaline materials.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. This product is damaged by oxidants. Do not mix acids and bleaches with DEBUG TRÉS.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with DEBUG TRÉS.
2. Fill tank with appropriate amount of water.
3. Add the pre-measured amount of DEBUG TRÉS.
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing DEBUG TRÉS with other pesticides.

SPRAYING DIRECTIONS:

Spray DEBUG TRÉS using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. Use a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. Use horizontal nozzles at 10- inch spacing and two vertical drops, one at each end. Each vertical drop must have two nozzles, one at 90° angle and the other at 45° angle. The water used for mixing should have a pH at about 5.5 for DEBUG TRÉS to be most effective. If necessary, use a buffer to bring the pH to the desired level.

1. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.
2. AERIAL APPLICATIONS: DEBUG TRÉS may be aerially applied using suitable equipment such as fixed-wing aircraft or helicopters

CHEMIGATION DIRECTIONS

GENERAL CHEMIGATION REQUIREMENTS:

- A. Apply this product only through sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation system.
- B. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- C. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- D. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- E. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops". The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected." Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
5. Do not apply when wind speed favors drift beyond the area intended for treatment.
6. Agitation is generally recommended in the pesticide supply tank.
7. Apply this product continuously for the duration of the water application.
8. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
9. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

DRIP (TRICKLE) CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Agitation is generally recommended in the pesticide supply tank.
8. Apply this product continuously for the duration of the water application.
9. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
10. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

For Golf Courses, Turf, Parks & Ornamentals
NEMATODE, AND TURF INSECT CONTROL

For Organic Turf Use. Controls many insects including: Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, Cabbage loopers, Armyworms, Colorado potato beetles, Diamondback moths, Grasshoppers, Maggots, Weevils, Chafers, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

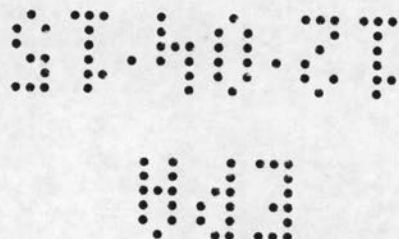
1. SHAKE THIS CONTAINER WELL BEFORE USE.
- 2A. FOR NEMATODE CONTROL: (Ornamentals and Turf)
 MIX 12 to 22.5 FL. OZ OF DEBUG TRÉS WITH 2 TO 50 GALLONS WATER TO SPRAY ON 1000 SQUARE FEET. Using sprinklers, deliver additional amounts of water to push the material to the required depth below ground level. Apply every week or as needed. Repeat application if the nematode count is over the threshold limit.
- 2B. FOR INSECT AND WORM CONTROL (see above list):
 MIX 0.30 to 1 FL. OZ. OF DEBUG TRÉS IN 2 TO 3 GALLONS OF WATER 12 FL. OZ. to 22.5 FL. OZ. of Debug Trés with 100 gallons water per a. Ensure that pH of this mixture is around 5.5 by using a buffer. Spray the mixture on to the turf. Using sprinklers or other means, deliver additional amounts of water to push the material to ¼ inch - ½ inch below ground level. For worm and insect control apply at the earliest sign of infestation. Repeat the application at 7- 10 days interval if infestation persists.
3. SPRAY DEBUG TRÉS IN THE EARLY MORNING OR LATE AFTERNOON, OR EVENINGS.
4. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.
5. USE AS A PREVENTATIVE TO KEEP INSECTS AWAY.

GENERAL:

- DEBUG TRÉS is more effective when used as a preventative.
- DEBUG TRÉS is a broad-spectrum herbal insecticide.
- DEBUG TRÉS affects the insects at all stages of growth.
- SHAKE THE CONTAINER WELL, BEFORE USE.
- IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION.

WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained here, conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage or handling of this material not in strict accordance with directions given herein.



AGRICULTURAL, HORTICULTURAL, AND GREENHOUSE USE

CROPS

Top fruits such as Citrus, Lemons, Oranges, Grapefruits, Pummalo, Apples, Plums, Peaches, Apricots, Avocados, Figs, Prunes, Nectarines, Pears. Mangoes, Cherries, Kiwifruit, Kumquats, Loquats, Quinces, Persimmons, and Palm.

Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, Gourds, Bitter melons, Chayote, Okra, Asparagus, and Melons.

Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Cauliflower, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, Kohlrabi, Chard, Collard, Amaranth, Radicchio, Chicory, Mustard Greens, Rapeseed, and Spinach.

Root and Tuber vegetables such as Beets, Carrots, Ginger, Radish, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, Ginseng, Rutabagas, Watercress, Artichokes and Turmeric.

Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.

Cereals such as Barley, Corn, Millet, Rice, Rye, Sorghum, Triticale, Oats, and Wheat.

Alfalfa and other feed & forage crops. Grasses

Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, and Eggplant.

Berries such as, Blackberries, Blueberries, Currants, Strawberries, Cane berries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries

Grapes

Tropical fruits such as Banana, Cherimoyas, Mangoes, Guavas, Papayas and Pineapple.

Cotton and oilseeds such as Canola, Sesame, Rapeseed, Sunflower, Safflower, Olive, Peanut and Jojoba

Herbs & Spices including but not limited to Mints, Anise, Basil, Chives, Coriander, Dill, Fennel, Marigold, Sage, and Thyme.

Mushrooms, such as: Agaricus, Bella, Enoki, Maitake, Oyster, Shitake, and other specialty mushrooms

Nuts such as Almonds, Pecans, Pistachios, Cashews, Chestnuts, Macadamia, Hazelnuts, Brazil nut, Water chestnuts, and Walnuts.

Coffee, Tea, Tobacco and Sugarcane.

Greenhouse Crops including ornamentals such as Chrysanthemums, Poinsettias, Roses, Lilies, Geraniums, Daisies, Carnations, Salvias and Dahlias.

All starter vegetables and fruit crops.

INSECT

PESTS/MITES/DISEASES/NEMATODES

Aphids
Armyworms
Fall Armyworms
Beetles, Beanleaf Beetles, Cucumber Beetles, Japanese Beetles, Mexican Beetles, Colorado Potato Beetles, Potato Flea Beetles, Corn beetles, Flea Beetles
Borers, Budworms.
Casebearers, Caterpillars, Codling Moth
Fruit Flies
Gnats, Fungus Gnats, Grasshoppers, Grubs
Leaf Hoppers, Leaf Perforators, Leafminers, Leafrollers, Loopers, Cabbage loopers, Lygus Bug
Maggots, Onion Maggots, Mealy Bugs, Mealybugs, Mildew, Rust and Powdery Mildew, Mites, Two Spotted Spidermites, Pacific Spider Mites, Moths, Diamondback Moths, Gypsy Moths, Grape Berry Moths,
Nematodes
Orange Toxix
Phylloxera, Phythium, Psylla, Psyllids
Rhizoctonia Solani
Scales, San Jose Scale
Sclerotinia Sclerotiorum
Sclerotium Rolfsii
Sharpshooters
Sucker Ants
Thrips
Weevils, Pepper Weevils, Boll weevils
Whiteflies
Worms
Wireworms
Webworms
Budworms
Alfalfa Worms
Boll Worms
Pickle Worms
Fagot Worms, Root Worms, Ear Worms, Cut Worms

DIRECTIONS FOR CROP APPLICATIONS

STANDARD APPLICATION : ALL APPLICATION RATES ARE FOR ONE ACRE

8 Fl. Oz to 22.5 Fl. Oz. of Debug Trés mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying in high population crops like berries and fruit trees, use dilution of 8 Fl. Oz. to 22.5 Fl. Oz. of Debug Trés with 100 to 300 gallons of water.

Repeat application at 7 to 14 day intervals, at least once and if necessary additional times.

For Greenhouse crops Prepare a 0.25% - 0.75% (0.30 oz – 1 oz./ Gal) solution of Debug Trés in water and completely drench the plants. Repeat every 5 to 7 days till infestation clears.

For NEMATODE CONTROL use 22.5 oz. Debug Trés per acre.

If using Drip Irrigation add enough water to deliver the product to the root zone.

If using Sprinklers apply the product by sprayer in the planting bed. Then use Sprinklers to deliver the product with enough water to reach the root zone.

Repeat applications at the same rate above, as needed.

WE RECOMMEND USING DEBUG TRÉS AS PREVENTATIVE APPLICATION EVEN IF THERE IS NO INFESTATION

Start applying when the plants are tall enough to be susceptible to infestation. Use the following:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 7 to 10 days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 10 to 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 10 to 15 days.
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 10 to 15 days.
- For **Grasses and Forage Crops like Alfalfa**, apply in spring, approximately weeks after dormancy period is over, and repeat every 10 to 15 days.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (22.5 FL. OZ. OF DEBUG TRÉS E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119 FOR AZADIRACTIN. FATS, AND GLYCERIDIC OILS MARGOSA IS EXEMPT FROM THE REQUIREMENT OF A TOLERANCE AS PER 40 CFR 180.1291. THERE IS NO LIMIT ON THE NUMBER OF APPLICATIONS.

Agro Logistic Systems, Inc.

P.O.Box: 5799

Diamond Bar, CA 91765, U.S.A.

TEL: (714) 990-9220; FAX: (714) 990-9222

e-mail: info@agrologistic.com

website: www.agrologistic.com

EPA REGISTRATION NO: 70310-I

EPA ESTABLISHMENT NO: 070310-IND-002

Sub-label B: For Home Gardens
Debug®Trés
For Indoor and Outdoor Use
For Organic Gardening

From the Neem Tree

**Ideal for Flower Beds, Vegetable Gardens, Lawns & Fruit Trees
Including indoor and outdoor plants grown in containers.**

**Antifeedant, Insect Repellent, Insecticide, Miticide, Fungicide & Nematicide
Controls many insects including:**

Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles,
Leafhoppers, Fruit worms, Spider mites, Caterpillars, loopers, Armyworms, Grasshoppers,
Maggots, Weevils, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii,
Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium etc.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice
HOT LINE NUMBER Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time (NPIC Web Site: www.npic.orst.edu).	

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

Net contents: [0.16 Fl. Oz]/[1 Fl. Oz]/[4 Fl. Oz]/[8 Fl. Oz]/[16 Fl. Oz]/[24 Fl. Oz]/[32 Fl. Oz]

EPA REGISTRATION No. 70310-I
EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765, U.S.A.
Tel: (714) 990-9220

PLEASE REFER TO THE FRONT PANEL FOR FIRST AID INSTRUCTIONS
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE) required for this product are long-sleeve shirt and long pants, socks, shoes, and chemical resistant gloves.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. **SHAKE THIS CONTAINER WELL BEFORE USE.**
2. **MIX 5 ML to 10 ML (1 to 2 TEASPOONS) OF DEBUG TRÉS WITH 24 TO 32 FL. OZ. WATER IN A SPRAY CONTAINER. SHAKE WELL.**
3. **SPRAY THE MIXTURE ON THE LEAVES AND STEMS, INCLUDING THE UNDERSIDE OF LEAVES SO AS TO COMPLETELY DRENCH THE PLANT.**
4. **SPRAY DEBUG TRES EARLY IN THE MORNING OR LATE AFTERNOON.**
5. **USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.**
6. **FOR BEST RESULTS, APPLY WEEKLY (OR MORE FREQUENTLY IF INFESTATION PERSISTS).**
7. **USE AS PREVENTATIVE TO KEEP INSECTS AWAY.**
8. **DO NOT WASH THE LEAVES FOR 24 HOURS AFTER SPRAYING.**
9. **FOR LAWN CARE, APPLY 10 ml (2 TEASPOONS) TO 20 ml (4 TEASPOONS) OR LESS OF CONCENTRATE PER 100 SQ. FT. PER APPLICATION.**
10. **IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION**

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage, or handling of this material not in strict accordance with directions given herein.

Manufacturing Date:
Expiry Date:

Product of India



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.
Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

Linda A. Hollis, Chief
Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
EPA Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

July 6, 2015

RE: **Debug Aza MUP, EPA File Symbol 70310-A, Decision Number 502429**
Debug Tres, EPA File Symbol 70310-T, Decision Number 502467
Debug Optimo, EPA File Symbol 70310-I, Decision Number 502469
Response to Deficiencies from your letters dated June 29, 2015

Dear Ms. Hollis:

Thank you for your letters dated June 29, 2015 in which you identified deficiencies and issues noted during the Preliminary 90-Day Technical Screen in the applications to register Debug Aza MUP, Debug Tres, and Debug Optimo. The following response to the noted deficiencies has been provided by the manufacturer of these products, Agro Logistic Systems:

Debug Aza MUP (70310-A) deficiencies:

1. There is a discrepancy regarding the active ingredient (AI) contained in your product.

Response: This discrepancy has been corrected – the active ingredient is now described consistently throughout the product label, CSF, manufacturing schematic, and product chemistry volumes.

2. The manufacturing process flow chart on page 9 of MRID 49586703 shows [REDACTED]

Response: The description of the manufacturing process has been revised to clarify that the [REDACTED]

3. MRID 49586701, page six, states that the only impurity in the final compound is [REDACTED]

[REDACTED] However, the CSF lists the impurities as [REDACTED]
Additionally, page five of MRID 49586701 also lists [REDACTED]
the impurities in the final product.

Response: The product chemistry volume has been revised to clarify which impurities are present in the final manufacturing use product. The product contains no [REDACTED] which are [REDACTED] that is now described in the narrative describing the manufacturing process as well as listed as a distinct manufacturing step on the manufacturing schematic. The



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.

Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

only impurities in the final product are

[REDACTED]

[REDACTED] These specific impurities, their respective CAS numbers, and their percentage in formulation have all been listed on the CSF for the product and are also discussed in the narrative portion of the product chemistry volume discussing the formation of impurities.

Debug Tres (70310-T) deficiencies:

1. This product contains EPA File Symbol: 70310-A as a source of active ingredient. The Agency has identified significant deficiencies pertaining to the manufacturing process and discussion of formation of impurities for EPA File Symbol: 70310-A.

Response: The deficiencies and issues noted in your review of Debug Aza MUP (File Symbol 70310-A) have been corrected and/or clarified and the product chemistry volume for File Symbol 70310-T has also been reviewed and edited for consistency with the revisions to 70310-A.

Debug Optimo (70310-I) deficiencies:

1. This product contains EPA File Symbol: 70310-A as a source of active ingredient. The Agency has identified significant deficiencies pertaining to the manufacturing process and discussion of formation of impurities for EPA File Symbol: 70310-A.

Response: The deficiencies and issues noted in your review of Debug Aza MUP (File Symbol 70310-A) have been corrected and/or clarified and the product chemistry volume for File Symbol 70310-I has also been reviewed and edited for consistency with the revisions to 70310-A.

Many thanks to you and your staff for your attention to these product applications. We are hopeful that the responses and revised documents in this submission will sufficiently address all of the issues and deficiencies identified in your 90-day Technical Screen. If any further corrections or clarifications are needed, please contact John Fournier at (607) 220-4860 or AcadiaRegulatory@gmail.com.

Respectfully,

Shyam Chari

TRANSMITTAL DOCUMENT

Date: 07/06/15

Company:

AGRO LOGISTIC SYSTEMS, INC.
555 W. LAMBERT ROAD, UNIT N
BREA, CA 92821
714-990-9220

Product Name/EPA Reg. #: Debug Aza MUP (EPA Reg Number: 70310-A)

<u>MRID</u>	<u>Study No.</u>	<u>Study Title</u>
49669801	1	Group A Product Chemistry for Debug Aza MUP

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Form Approved OMB No. 2070-0060


Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2137)U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX

Date July 6, 2015	EPA Reg. No./File Symbol 70310-I	Page 1 of 1
Applicant's/Registrant Name and Address Agro Logistic Systems, Inc. P.O. Box 5799 Diamond Bar, CA 91765	Product Debug Tres	

Ingredient Azadirachtin, Fats and Glyceridic Oils, Margosa

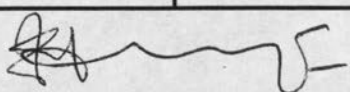
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 880.1100	Product Identity and Composition	NEW	Agro Logistic Systems, Inc.	OWN	
OPPTS 880.1200	Description of Starting Materials, Production and Formulation Processes	NEW	Agro Logistic Systems, Inc.	OWN	
OPPTS 830.1750	Certified Limits		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1100	Acute Oral Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1200	Acute Dermal Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1300	Acute Inhalation Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2400	Primary Eye Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2500	Primary Dermal Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2600	Dermal Sensitization		Agro Logistic Systems, Inc.	OWN	

Signature 	Name and Title Shyam K. Chari, President	Date July 6, 2015
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX

Date July 6, 2015			EPA Reg. No./File Symbol 70310-I	Page 1 of 1	
Applicant's/Registrant Name and Address Agro Logistic Systems, Inc. P.O. Box 5799 Diamond Bar, CA 91765			Product Debug Tres		
Ingredient Azadirachtin, Fats and Glyceridic Oils, Margosa					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
			Agro Logistic Systems, Inc.	OWN	
Signature 			Name and Title Shyam K. Chari, President		Date July 6, 2015



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.
Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Gina Burnett, Regulatory Action Leader, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

August 19, 2015

RE: **Application for New Product Registrations**
File Symbol 70310-A: Debug Aza MUP, PRIA Category B673
File Symbol 70310-T: Debug Optimo, PRIA Category B670
File Symbol 70310-I: Debug Tres, PRIA Category B670

Dear Ms. Burnett:

Please refer to your email of August 18, 2015 for the above submissions.

You have identified the following remaining outstanding deficiencies-

1. [REDACTED]

Response: We have corrected the CSF and also relevant pages of the Product Chemistry Group A Part 2 of 2 to clarify each of the impurities as [REDACTED]
We hope this is satisfactory.

2. [REDACTED] is not detailed in the schematic provided
after page 41 for 70310-T and after page 48 for 70310-I.

Response: We have corrected the schematic to detail this process in the schematics for both 70310-T and 70310-I. As mentioned in the discussion Production and formulation process is a [REDACTED]

The corrected schematics for 70310-T and 70310-I is attached. The description portion of the manufacturing process to include the composition of the [REDACTED] for both products is also attached.

Debug TURBO



**AGRO
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555 W. Lambert Road, Unit - N, Brea, CA 92821.

Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

Also attached is the corrected Master Labels for Debug Optimo (70310-T) and Debug Tres (70310-I).

Respectfully,

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Master Label Debug®Trés

Page 1 of 6

Sub-label A: For Agriculture, Horticulture & Greenhouses, Golf Courses, Turf, & Ornamentals

Sub-label B: For Home Gardens

Emulsifiable Concentrate

**AGRICULTURAL, HORTICULTURAL, GREENHOUSE, AND OUTDOOR
DOMESTIC TERRESTRIAL PESTICIDE**

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

Azadirachtin

4.70%

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

*Shenell -
Updated Labels for
two of the 'Debug'
products. Please
use these.
Thanks! Gina
10/6/05*

0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
U.S.A.

TEL: (714) 990-9220
e-mail: info@agrologistic.com
Website: www.agrologistic.com

Net contents: [4 Fl. Oz.]/ [8 Fl. Oz.]/ [32 Fl. Oz.]/ [1 Gal]

PRECAUTIONARY STATEMENTS
HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if absorbed through skin or if inhaled.
Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)
Applicators, Mixers and other handlers must wear
-Coveralls
- Socks, shoes, and
-Chemical resistant gloves.
Follow manufacturer's instructions for cleaning/maintaining PPE. If no such instructions for washables use detergent and hot water. Keep and wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.
Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.
This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

Batch No:
Manufacturing Date:
Expiry Date:

PRODUCT OF INDIA

MANUFACTURED FOR
Agro Logistic Systems, Inc.
P.O. Box 5799, Diamond Bar, CA 91765,
U.S.A.
TEL: (714) 990-9220
Website: www.agrologistic.com

EPA REGISTRATION No. 70310-I
EPA ESTABLISHMENT No.070310-IND-
002

**Sub-label A: Agriculture, Horticulture, Greenhouse,
Golf Courses, Turf, Parks & Ornamentals**

Debug®Trés

**Emulsifiable Concentrate
Antifeedant, Insect Repellent,
Insecticide, Miticide, Fungicide & Nematicide**



FOR ORGANIC PRODUCTION

ACTIVE INGREDIENT:

Fats and Glyceridic 4.70%
Oils Margosa 3.00%
Azadirachtin 92.30%
OTHER INGREDIENTS:

TOTAL: 100.00%
0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID	
If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice
HOT LINE NUMBER Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30AM to 4:30PM Pacific Time (NPIC Web Site: www.npic.orst.edu).	

Net contents: [4 Fl. Oz]/[8 Fl. Oz]/[32 Fl. Oz]/[1 Gal]

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.
Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.
Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is:

- Coveralls
- Chemical resistant gloves, such as barrier laminates or butyl rubber or nitrile rubber or PVC.
- Shoes and socks

NON- AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used on agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate. For Commercial Agricultural Use:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly after emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

DEBUG TRÉS
PLEASE READ THE FOLLOWING INFORMATION
CAREFULLY BEFORE USING DEBUG TRÉS

TANK MIXING:

'**DEBUG TRÉS** is compatible with commonly used insecticides, fungicides and foliar fertilizers. Do not use Debug Trés with Bordeaux mixture, lime sulfur or other highly alkaline materials.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. This product is damaged by oxidants. Do not mix acids and bleaches with **DEBUG TRÉS**.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with **DEBUG TRÉS**.
2. Fill tank with appropriate amount of water.
3. Add the pre-measured amount of **DEBUG TRÉS**.
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing **DEBUG TRÉS** with other pesticides.

SPRAYING DIRECTIONS:

Spray **DEBUG TRÉS** using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. Use a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. Use horizontal nozzles at 10- inch spacing and two vertical drops, one at each end. Each vertical drop must have two nozzles, one at 90° angle and the other at 45° angle. The water used for mixing should have a pH at about 5.5 for **DEBUG TRÉS** to be most effective. If necessary, use a buffer to bring the pH to the desired level.

1. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.
2. AERIAL APPLICATIONS: **DEBUG TRÉS** may be aerially applied using suitable equipment such as fixed-wing aircraft or helicopters

CHEMIGATION DIRECTIONS

GENERAL CHEMIGATION REQUIREMENTS:

- A. Apply this product only through sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation system.
- B. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- C. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- D. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- E. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.

3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops". The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected". Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
5. Do not apply when wind speed favors drift beyond the area intended for treatment.
6. Agitation is generally recommended in the pesticide supply tank.
7. Apply this product continuously for the duration of the water application.
8. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
9. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

DRIP (TRICKLE) CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Agitation is generally recommended in the pesticide supply tank.
8. Apply this product continuously for the duration of the water application.
9. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
10. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

For Golf Courses, Turf, Parks & Ornamentals
NEMATODE, AND TURF INSECT CONTROL

For Organic Turf Use. Controls many insects including:
Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, Cabbage loopers, Armyworms, Colorado potato beetles, Diamondback moths, Grasshoppers, Maggots, Weevils, Chafers, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. SHAKE THIS CONTAINER WELL BEFORE USE.
- 2A. FOR NEMATODE CONTROL: (Ornamentals and Turf)
MIX 12 to 22.5 FL. OZ. OF **DEBUG TRÉS** WITH 2 TO 50 GALLONS WATER TO SPRAY ON 1000 SQUARE FEET. Using sprinklers, deliver additional amounts of water to push the material to the required depth below ground level. Apply every week or as needed. Repeat application if the nematode count is over the threshold limit.
- 2B. FOR INSECT AND WORM CONTROL (see above list):
MIX 0.30 to 1 FL. OZ. OF **DEBUG TRÉS** IN 2 TO 3 GALLONS OF WATER. 12 FL. OZ. to 22.5 FL. OZ. of **Debug Trés** with 100 gallons water per acre. Ensure that pH of this mixture is around 5.5 by using a buffer. Spray the mixture on to the turf. Using sprinklers or other means, deliver additional amounts of water to push the material to ¼ inch - ½ inch below ground level. For worm and insect control apply at the earliest sign of infestation. Repeat the application at 7- 10 days interval if infestation persists.
3. SPRAY **DEBUG TRÉS** IN THE EARLY MORNING OR LATE AFTERNOON, OR EVENINGS.
4. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.
5. USE AS A PREVENTATIVE TO KEEP INSECTS AWAY.

GENERAL:

- **DEBUG TRÉS** is more effective when used as a preventative.
- **DEBUG TRÉS** is a broad-spectrum herbal insecticide.
- **DEBUG TRÉS** affects the insects at all stages of growth.
- SHAKE THE CONTAINER WELL, BEFORE USE.
- IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION.

WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage or handling of this material not in strict accordance with directions given herein.

AGRICULTURAL, HORTICULTURAL, AND GREENHOUSE USE

CROPS

Top fruits such as Citrus, Lemons, Oranges, Grapefruits, Pummalo, Apples, Plums, Peaches, Apricots, Avocados, Figs, Prunes, Nectarines, Pears. Mangoes, Cherries, Kiwifruit, Kumquats, Loquats, Quinces, Persimmons, and Palm. Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, Gourds, Bitter melons, Chayote, Okra, Asparagus, and Melons. Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Cauliflower, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, Kohlrabi, Chard, Collard, Amaranth, Radicchio, Chicory, Mustard Greens, Rapeseed, and Spinach.

Root and Tuber vegetables such as Beets, Carrots, Ginger, Radish, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, Ginseng, Rutabagas, Watercress, Artichokes and Turmeric. Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.

Cereals such as Barley, Corn, Millet, Rice, Rye, Sorghum, Triticale, Oats, and Wheat.

Alfalfa and other feed & forage crops. Grasses

Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, and Eggplant.

Berries such as, Blackberries, Blueberries, Currants, Strawberries, Cane berries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries. Grapes

Tropical fruits such as Banana, Cherimoyas, Mangoes, Guavas, Papayas and Pineapple.

Cotton and oilseeds such as Canola, Sesame, Rapeseed, Sunflower, Safflower, Olive, Peanut and Jojoba

Herbs & Spices including but not limited to Mints, Anise, Basil, Chives, Coriander, Dill, Fennel, Marigold, Sage, and Thyme.

Mushrooms, such as: Agaricus, Bella, Enoki, Maitake, Oyster, Shitake, and other specialty mushrooms

Nuts such as Almonds, Pecans, Pistachios, Cashews, Chestnuts, Macadamia, Hazelnuts, Brazil nut, Water chestnuts, and Walnuts.

Coffee, Tea, Tobacco and Sugarcane.

Greenhouse Crops including ornamentals such as Chrysanthemums, Poinsettias, Roses, Lilies, Geraniums, Daisies, Carnations, Salvias and Dahlias.

All starter vegetables and fruit crops.

INSECT

PESTS/MITES/DISEASES/NEMATODES

Aphids

Armyworms

Fall Armyworms

Beetles, Beanleaf Beetles, Cucumber Beetles, Japanese Beetles, Mexican Beetles, Colorado Potato Beetles, Potato Flea Beetles, Corn beetles, Flea Beetles

Borers, Budworms.

Casebearers, Caterpillars, Codling Moth

Fruit Flies

Gnats, Fungus Gnats, Grasshoppers, Grubs

Leaf Hoppers, Leaf Perforators, Leafminers,

Leafrollers, Loopers, Cabbage loopers, Lygus Bug

Maggots, Onion Maggots, Mealy Bugs, Mealybugs,

Mildew, Rust and Powdery Mildew, Mites, Two

Spotted Spidermites, Pacific Spider Mites, Moths,

Diamondback Moths, Gypsy Moths, Grape Berry

Moths,

Nematodes

Orange Toxrix

Phylloxera, Phythium, Psylla, Psyllids

Rhizoctonia Solani

Scales, San Jose Scale

Sclerotinia Sclerotium

Sclerotium Rolfsii

Sharpshooters

Sucker Ants

Thrips

Weevils, Pepper Weevils, Boll weevils

Whiteflies

Worms

Wireworms

Webworms

Budworms

Alfalfa Worms

Boll Worms

Pickle Worms

Fagot Worms, Root Worms, Ear Worms, Cut

Worms

DIRECTIONS FOR CROP APPLICATIONS

STANDARD APPLICATION : ALL APPLICATION RATES ARE FOR ONE ACRE

8 Fl. Oz. to 22.5 Fl. Oz. of Debug Trés mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying in high population crops like berries and fruit trees, use dilution of 8 Fl. Oz. to 22.5 Fl. Oz. of Debug Trés with 100 to 300 gallons of water.

Repeat application at 7 to 14 day intervals, at least once and if necessary additional times.

For Greenhouse crops Prepare a 0.25% - 0.75% (0.30 oz - 1 oz./ Gal) solution of Debug Trés in water and completely drench the plants. Repeat every 5 to 7 days till infestation clears.

For NEMATODE CONTROL use 22.5 oz. Debug Trés per acre.

If using Drip Irrigation add enough water to deliver the product to the root zone.

If using Sprinklers apply the product by sprayer in the planting bed. Then use Sprinklers to deliver the product with enough water to reach the root zone.

Repeat applications at the same rate above, as needed.

WE RECOMMEND USING DEBUG TRÉS AS PREVENTATIVE APPLICATION EVEN IF THERE IS NO INFESTATION

Start applying when the plants are tall enough to be susceptible to infestation. Use the following:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 7 to 10 days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 10 to 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 10 to 15 days.
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 10 to 15 days.
- For **Grasses and Forage Crops like Alfalfa**, apply in spring, approximately 2 weeks after dormancy period is over, and repeat every 10 to 15 days.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (22.5 FL. OZ. OF DEBUG TRÉS E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119 FOR AZADIRACTIN. FATS, AND GLYCERIDIC OILS MARGOSA IS EXEMPT FROM THE REQUIREMENT OF A TOLERANCE AS PER 40 CFR 180.1291. THERE IS NO LIMIT ON THE NUMBER OF APPLICATIONS.

Agro Logistic Systems, Inc.

P.O.Box: 5799

Diamond Bar, CA 91765, U.S.A.

TEL: (714) 990-9220; FAX: (714) 990-9222

e-mail: info@agrologistic.com

website: www.agrologistic.com

EPA REGISTRATION NO: 70310-I

EPA ESTABLISHMENT NO: 070310-IND-002

Sub-label B: For Home Gardens

Debug®Trés

For Indoor and Outdoor Use

For Organic Gardening

From the Neem Tree

**Ideal for Flower Beds, Vegetable Gardens, Lawns & Fruit Tre
Including indoor and outdoor plants grown in containers.**

Antifeedant, Insect Repellent, Insecticide, Miticide, Fungicide & Nematic

Controls many insects including:

Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles,
Leafhoppers, Fruit worms, Spider mites, Caterpillars, loopers, Armyworms, Grasshopper
Maggots, Weevils, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium ro
Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium etc

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID	
If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if pos - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4 Time (NPIC Web Site: www.npic.orst.edu).

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

4.70%

Azadirachtin

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.6 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

Net contents: [0.16 Fl. Oz.]/[1 Fl. Oz.]/[4 Fl. Oz.]/[8 Fl. Oz.]/[16 Fl. Oz.]/[24 Fl. Oz.]/[

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.

P.O. Box 5799

Diamond Bar, CA 91765, U.S

Tel: (714) 990-9220

PLEASE REFER TO THE FRONT PANEL FOR FIRST AID INSTRUCTIONS
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE) required for this product are long-sleeve shirt and long pants, socks, shoes, and chemical resistant gloves.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

- 1. SHAKE THIS CONTAINER WELL BEFORE USE.**
- 2. MIX 5 ML to 10 ML (1 to 2 TEASPOONS) OF DEBUG TRÉS WITH 24 TO 32 FL. OZ. WATER IN A SPRAY CONTAINER. SHAKE WELL.**
- 3. SPRAY THE MIXTURE ON THE LEAVES AND STEMS, INCLUDING THE UNDERSIDE OF LEAVES SO AS TO COMPLETELY DRENCH THE PLANT.**
- 4. SPRAY DEBUG TRES EARLY IN THE MORNING OR LATE AFTERNOON.**
- 5. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.**
- 6. FOR BEST RESULTS, APPLY WEEKLY (OR MORE FREQUENTLY IF INFESTATION PERSISTS).**
- 7. USE AS PREVENTATIVE TO KEEP INSECTS AWAY.**
- 8. DO NOT WASH THE LEAVES FOR 24 HOURS AFTER SPRAYING.**
- 9. FOR LAWN CARE, APPLY 10 ml (2 TEASPOONS) TO 20 ml (4 TEASPOONS) OR LESS OF CONCENTRATE PER 100 SQ. FT. PER APPLICATION.**
- 10. IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION**

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage, or handling of this material not in strict accordance with directions given herein.

Manufacturing Date:
Expiry Date:

Product of India

PRIA 3 – 21 Day Content Screen Review Worksheet

(EPA/OPP Use Only)

September 2012

21 Day Screen Start Date: 3-11-15

Experts In-Processing Signature: B.B.

Date 3-20-15

Fee Paid: Yes ☒

Division management contacted on issues No ☐ Yes ☐ Date _____

EPA Reg. Number: <u>70310-I</u>		EPA Receipt Date: <u>3-11-15</u>								
Items for Review				Yes	No	N/A*				
1	Application Form (EPA Form 8570-1) signed & complete including package type			X						
2	Confidential Statement of Formula all boxes completed, form signed, and dated (EPA Form 8570-4)			X						
	a) All <u>inerts</u> , including fragrances, approved for the proposed uses (see Footnote A)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">yes</td> <td style="width: 50%; text-align: center;">no</td> </tr> <tr> <td style="text-align: center;">X</td> <td></td> </tr> </table>	yes	no	X				
yes	no									
X										
3	Certification with Respect to Citation of Data (EPA Form 8570-34) completed and signed (N/A if 100% repack)			X						
	Certificate and data matrix consistent			X						
	If applicant is relying on data that are compensable, is the offer to pay statement included. (see Footnote B)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">yes</td> <td style="width: 50%; text-align: center;">no</td> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no									
	If applicable, is there a letter of Authorization for exclusive use only.									
4	Formulator's Exemption Statement (EPA Form 8570-27) completed and signed (N/A if source is unregistered or applicant owns the technical)					X				
	Data Matrix (EPA Form 8570-35) both internal and external copies (PR 98-5) completed and signed (N/A if 100% repack)			X						
5	a) Selective Method (Fee category experts use)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">yes</td> <td style="width: 50%; text-align: center;">no</td> </tr> <tr> <td style="text-align: center;">X</td> <td></td> </tr> </table>	yes	no	X				
yes	no									
X										
	b) Cite-All (Fee category experts use)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">yes</td> <td style="width: 50%; text-align: center;">no</td> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no									
	c) Applicant owns all data (Fee category experts use)		<table border="1" style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; text-align: center;">yes</td> <td style="width: 50%; text-align: center;">no</td> </tr> <tr> <td></td> <td></td> </tr> </table>	yes	no					
yes	no									
6	5 Copies of <u>Label</u> (<u>Electronic labels on CD</u> are encouraged and guidance is available)			X						
7	Is the data package consistent with <u>PR Notice 86-5</u>			X						
8	Notice of Filing included with petitions					X				

21-11-8

.d.d

21-11-8

21-11-8

I-01807

X

X

X

X

X

X

X

X

X

9	If applicable for conventional applications, <u>reduced risk rationale</u>			X
10	<u>Required Data</u> and/or data waivers. See Footnote C.			
	a) List study (or studies) not included with application			

Comments:

* Documentation: (PAU) / FAZL

Jacket Record: 3-24-15

- Contacted submitter for NTSTG guideline §30.1800 on 3-25-15
- contacted again on 3-30-15
- submitter e-mailed back on 3-30-15
- According to submitter, §30.180 TS N/A

* Inerts: (PAU) / FAZL

Inerts approved for pre-harvest application.

* PRN 113: (PAU) / FAZL

MRZD: 495869

* Overall Status: (PAU) / FAZL

7L 3-31-15

* N/A – Not Applicable

Footnotes

A. During the 21 day initial content review, all CSFs will be reviewed to determine whether all inerts listed, including fragrances, are approved for the proposed uses or have an application pending with the Agency. If an unapproved inert with no application pending with the Agency is identified, the applicant must either 1) resolve the inert issue by, for example, removing the inert, substituting it with an approved inert, submitting documentation that EPA approved the inert for the proposed pesticidal uses, correcting mistakes on the CSF, etc. or 2) provide the data to support OPP approval of the inert or 3) withdraw the application. Removing or substituting an inert ingredient will require a new CSF and may require submission of data. All information, forms, data and documentation resolving the inert issue must have been received by the Agency or the application withdrawn within the 21 day period, otherwise, the Agency will reject the application as described below.

To successfully complete this aspect of the 21 day initial content screen, applicants are **strongly encouraged** to verify that all inert ingredients have been approved for the application's uses or have an application pending with the Agency **even if a product is currently registered** by consulting the [inert Web site](#) and if the inert is not approved nor has an application pending with the Agency, to **obtain the necessary inert approval prior to submitting an application to register a pesticide product containing that inert ingredient**. Some inert ingredients are no longer approved for food uses or certain types of uses. The name and/or CAS number on a CSF must match the name and CAS number on this web site. Simple typographical errors in the name or CAS number have resulted in processing delays.

If an inert is not listed on the inert ingredient web site and the applicant believes that the inert has been approved, the applicant should contact the Inert Ingredient Assessment Branch (IIAB) at inertsbranch@epa.gov and resolve the issue. Copies of the correspondence with IIAB resolving the issue should accompany the application. All new inerts except PIP inerts are reviewed by IIAB. The IIAB should also be contacted for any questions on what supporting data needs to be submitted for and the Agency's inert review process. Questions on PIP inerts should be directed to the [Chief of Microbial Pesticides Branch](#).

When a brand, trade, or proprietary name of an inert ingredient is listed on a CSF, additional information such as an alternate name of the inert, CAS number or other information must also be included to enable the Agency to determine if it has been approved. Each component of an inert mixture (including a fragrance) must be identified. In some cases, the supplier of the mixture or fragrance may need to provide this information to the Agency. Prior to the Agency's receipt of an application, applicants must arrange with a proprietary mixture or fragrance supplier to provide the component information to the Agency or promptly upon EPA's request. If the inert ingredients in a proprietary blend (including fragrances) cannot or are not identified or provided within the 21-day content review period, the Agency will reject the application.

During the 21 day content review, applicants should submit information to the individual identified by the Agency when the applicant is informed of an unapproved inert.

Unapproved Inerts Identified on CSFs

All applications except conventional new products and PIPs

Once an unapproved inert is identified on a CSF, the Agency will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Provide the required information necessary to identify an inert approval application that is pending with the Agency; or
3. Submit the information and data needed for the Agency to approve the unapproved inert. If this option is selected and implemented, the Agency may request an extension in the PRIA decision review timeframe to accommodate the inert review/approval process;
4. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of these options is selected and implemented by the applicant within the 21 day content review period, the Agency will reject the application and retain 25% of the full fee of the category identified.

Conventional New Product Applications

When the Registration Division identifies an unapproved inert on a CSF with an application for a new product that the applicant has not identified as requiring an inert approval (R300 or R301), it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the inert's identity or CAS number, providing documentation that the inert has been approved, or removing the unapproved inert from the CSF or replacing it with one that is approved for the application's uses; or
2. Submit the information and data needed for the Agency to approve the unapproved inert, including any required petition to establish or amend a tolerance or exemption from a tolerance. (This option may change the PRIA category for the application, which could require a longer decision review time and a larger fee. If additional fees are due, they must be received by the Agency within the 21 day content review period.)

3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21-day content-review period, the Agency will reject the application and retain 25% of the appropriate fee for the new product-inert approval category.

PIP Applications

When the Biopesticide and Pollution Prevention Division identifies an unapproved inert on a PIP CSF and a request to approve the inert does not accompany the application, it will contact the applicant with the following options:

1. Correct the application by, for instance, correcting the spelling or name of the inert to that in 40 CFR 174, or providing documentation that the inert has been approved; or
2. Submit the information and data needed for the Agency to approve the unapproved inert. If an inert ingredient tolerance exemption petition is required, the petition must be received by the Agency and the B903 fee paid within the 21 day period. If this option is selected and implemented, the Agency will discuss harmonizing the timeframe for both actions.
3. Withdraw the application (the Agency retains 25% of the full fee for the fee category estimated); or

If none of the above options is selected and implemented during the 21 day content review period, the Agency will reject the application and retain 25% of the fee.

B. A policy on documentation of offers to pay is still being developed, however, for a me-too or fast track (similar/identical) new product, R300 or A530, an application without the necessary authorizations of offers to pay will be placed into either R301 or A531. The Agency recommends that authorizations of offers to pay be submitted with other PRIA applications to avoid delays in the Agency's decision.

C. Biopesticide applicants are advised to contact the Agency and discuss study waivers prior to submitting their application to the Agency. Documentation of such discussions should be submitted with the study waiver.

Kang, Ji Yeon

From: John Fournier <johnfournier77@gmail.com>
Sent: Monday, March 30, 2015 3:04 PM
To: Kang, Ji Yeon
Cc: shyam@agrologistic.com
Subject: Fwd: FW: Submission to EPA: Debug Optimo and Debug Tres (EPA Reg. No. 70310-T & 70310-I)
Attachments: Group B Product Chemistry- Debug Optimo 3Feb2015.docx

Dear Joyce,

Thank you for taking my call earlier. Shyam Chari from AgroLogistic asked me to look into this to ensure everything was good to go with these product submissions. Attached is a .word version of the Group B product chemistry for Debug Optimo title page. Thank you for printing and adding it to the submission.

I believe everything on the data matrices is correct as they were submitted but, as you requested, the following additional information is provided:

For 830.1800 (enforcement method), this is N/A to these two end products because they are made with active ingredients that are tolerance exempt for which there is no enforcement method. Please refer to the tolerance exemption for azadirachtin and cold pressed neem oil for confirmation of this. These tolerance exemptions are found at 40CFR 180.1119 and 180.1291.

All of the other listed product chemistry requirements (830.6313, 7050, 7200, 7220, 7550, 7560, 7570, 7840, and 7950) apply only to TGAs, not to end use products (EPs). Please refer to the data table linked below at 40CFR 158.2030 for confirmation of this.

Regarding the human health data requirements, please refer to the table at 40CFR 158.2050. All of these data (870.3100, 3250, 3465, 3700, 5100, 5300, 5375) are required only for TGAs, not end use products.

Lastly, for the non target organism studies (850.2100, 2200, 1075, 1010, 4100, 4150), these data are only required when there are additional ingredients in the product formulation that are expected to cause effects to non target organisms. These two end use products are formulated using only minimum risk inerts (EPA List 4A and 4B inerts) and, as such, there are no expected effects to non target organisms. For biopesticide end product submissions, these data are typically not submitted. Please refer to the table at 40CFR 158.2060. While it says that the data is required, you have to look at the applicable test notes in the far right column. None of the listed test notes (1, 2, 3, 4, or 5) are applicable to either of these end use products due to their formulation with minimum risk, tolerance exempt inert ingredients.

Please refer to the data tables in the 40CFR at the following links:

http://www.ecfr.gov/cgi-bin/text-idx?SID=d5f57736ef4ae76d097b833f77657a03&node=se40.24.158_12030&rgn=div8
http://www.ecfr.gov/cgi-bin/text-idx?SID=d5f57736ef4ae76d097b833f77657a03&node=se40.24.158_12050&rgn=div8
http://www.ecfr.gov/cgi-bin/text-idx?SID=d5f57736ef4ae76d097b833f77657a03&node=se40.24.158_12060&rgn=div8

I hope I have sufficiently addressed all of your questions. Please let me know if there is anything else you need.

Many thanks,

John Fournier
Regulatory Consultant
331 West King Road
Ithaca, NY 14850

----- Forwarded message -----

From: **shyam chari** <shyam.chari@att.net>
Date: 2015-03-25 14:12 GMT-04:00
Subject: FW: Submission to EPA: Debug Optimo and Debug Tres (EPA Reg. No. 70310-T & 70310-I)
To: John Fournier <johnfournier77@gmail.com>

Hello John:

Please see below. I just got this just now.

I do not know what she wants. Can you help?

Thanks

Shyam

From: Kang, Ji Yeon [mailto:Kang.Joyce@epa.gov]
Sent: Wednesday, March 25, 2015 10:45 AM
To: shyam@agrologistic.com
Cc: Ashe, Anthony
Subject: Submission to EPA: Debug Optimo and Debug Tres (EPA Reg. No. 70310-T & 70310-I)

Dear Mr. Chari,

My name is Joyce Kang and I am a contractor with the EPA. I am contacting you in regards to your submission in support of the product Debug Optimo and Debug Tres (EPA Reg. No. 70310-T & 70310-I). We have found a deficiency with the submission that will need to be addressed:

1. For both registrations (Reg # 70310-T & 70310-I), the Data Matrices you provided are missing the following guideline. Please provide updated data matrices providing information about their status:

1. 830.1800 - Enforcement analytical method
2. 830.6313 - Stability to normal and elevated temperatures metal and metal ions
3. 830.7050 - UV/Visible Absorption
4. 830.7200 - Melting Point
5. 830.7220 - Boiling Point
6. 830.7550, 830.7560 & 830.7570 - Partition Coefficient
7. 830.7840 - Water Solubility
8. 830.7950 - Vapor Pressure
9. 870.3100 - 90-day oral
10. 870.3250 - 90-day dermal - rat
11. 870.3465 - 90-day inhalation - rat\
12. 870.3700 - Prenatal Developmental - rat preferably
13. 970.5100 - Bacterial Reverse Mutation Test
14. 870.5300 & 870.5375 - In vitro mammalian cell assay
15. 850.2100 - Avian Acute Oral Toxicity
16. 850.2200 - Avian Dietary Toxicity
17. 850.1075 - Fish Acute Toxicity, Freshwater
18. 850.1010 - Aquatic Invertebrate Acute Toxicity, Freshwater
19. 850.4100 - Terrestrial Plant Toxicity, Seedling Emergence
20. 850.4150 - Terrestrial Plant Toxicity, Vegetative Vigor

2. For study MRID 49586802 "Group B Product Chemistry for Debug Optimo," no title page was included for this study. (Reg # 70310-T)

Please send the necessary documents before Apr 2nd so that we may further process your submission. After Apr 2nd, please direct all correspondence/corrections to the appropriate EPA Risk Manager. If you have any questions, please do not hesitate to contact me.

Best,

Joyce Kang

Contractor, US EPA

2777 S. Crystal Drive, S-4822

Arlington, VA 22202

(703) 347-0416

Email: kang.joyce@epa.gov

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Il faut cultiver notre jardin.

A B672 is described as a new product; non-food use or food use having established tolerance or tolerance exemption; unregistered source of active ingredient; no data compensation issues; all Tier I data requirements for product chemistry, toxicology, non-target organisms, and product performance must be addressed with product-specific data or with request for data waivers supported by scientific rationales.

This PRIA code is interpreted as an application for registration of a microbial or biochemical pesticide product that is **not** substantially similar or identical in its uses and/or formulation to products that are currently registered. These applications require product specific chemistry data, acute toxicity data and other Tier I mammalian and non-target toxicity data as determined by the general use patterns for the product. When public health pests are claimed, efficacy (product performance) data for the product must be submitted.

End Use (EP) Data. Manufacturing Use (MP) product or Technical Grade of the Active Ingredient (TGA). This is for products with an unregistered source of active ingredient(s). These products are not 100% identical (repack)

Guideline No.	Product Chemistry Data Study Title	EP Data Submitted/ Cited		MP or TGA Data Submitted/ Cited	
		Yes	No	Yes	No
880.1100	Product Identity & Composition	✓			
880.1200	Description of starting materials production and formulation process.	✓			
880.1400	Discussion on the formation of impurities	✓			
830.1700	Preliminary analysis	✓			
830.1750	Certified limits (158.345)	✓			
830.1800	Enforcement analytical method		✓		
830.6302	Color	✓			
830.6303	Physical State	✓			
830.6304	Odor	✓			
830.6313	Stability to normal and elevated temperatures metal and metal ions				
830.6315	Flammability	✓			
830.6317	Storage stability	✓			
830.6319	Miscibility	✓			
830.6320	Corrosion Characteristics	✓			
830.7000	pH	✓			
830.7050	UV/ Visible Absorption				
830.7100	Viscosity	✓			
830.7200	Melting Point				
830.7220	Boiling Point				
830.7300	Density	✓			
830.7550	Partition Coefficient				
830.7560					

830.7570					
830.7840	Water Solubility				
830.7950	Vapor Pressure				

Grayed out = data not required

New products which are generated using an unregistered source of the active ingredient must either: 1) supply the product specific acute toxicity data (listed below), or 2) provide a bridging rationale document or a waiver request with a rationale. The bridging approach may be acceptable since the TGAi data is generated and submitted in addition to the end use data. If the inert components in the end use product are benign and do not significantly add to the ep such that the ep is significantly different from the MP thus changing the tox profile, a bridging argument may be deemed acceptable. This decision however, is made by the regulatory division.

End-use product Toxicity Data Requirements

Guideline No.	Acute toxicity (6 pack) Study Title	Data submitted		Cited		Waiver Request Rationale	
		Yes	No	Yes	No	Yes	No
870.1100	Acute Oral (LD50)					✓	
870.1200	Acute Dermal (LD50)					✓	
870.1300	Acute Inhalation (LC50)					✓	
870.2400	Acute Eye Irritation					✓	
870.2500	Acute Dermal Irritation					✓	
870.2600	Dermal Sensitization					✓	

Manufacturing Use Product (MP) or Technical Grade Active Ingredient (TGAi) Toxicity Data Requirements. The test substance must be the TGAi or MP

Guideline No.	Acute toxicity (6 pack) Study Title	Data submitted		Cited		Waiver Request Rationale	
		Yes	No	Yes	No	Yes	No
870.1100	Acute Oral (LD50)						
870.1200	Acute Dermal (LD50)						
870.1300	Acute Inhalation (LC50)						
870.2400	Acute Eye Irritation						
870.2500	Acute Dermal Irritation						
870.2600	Dermal Sensitization						
870.3100	90-day oral (one species						

870.3250	90-day dermal - rat						
870.3465	90-day inhalation - rat						
870.3700	Prenatal Developmental - rat preferably						
870.5100	Bacterial Reverse Mutation Test						
870.5300	<i>In vitro</i> mammalian cell assay						
870.5375							

Manufacturing Use Product (MP) or Technical Grade Active Ingredient (TGAi) Non-target Organism Toxicity. The test substance must be the TGAi or MP

Guideline No.	Non-Target Organism Acute Toxicity Study Title	Data submitted		Cited		Waiver Request Rationale	
		Yes	No	Yes	No	Yes	No
850.2100	Avian Acute Oral Toxicity						
850.2200	Avian Dietary Toxicity						
850.1075	Fish Acute Toxicity, Freshwater						
850.1010	Aquatic Invertebrate Acute Toxicity, Freshwater						
850.4100	Terrestrial Plant Toxicity, Seedling Emergence						
850.4150	Terrestrial Plant Toxicity, Vegetative Vigor						

Efficacy - Whether or not these data are submitted depends on the proposed label use (public health pests). Data are conducted on the end-use product.



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

March 19, 2015

OFFICE OF CHEMICAL SAFETY
AND POLLUTION PREVENTION

OPP Decision Number: D-502469
EPA File Symbol or Registration Number: 70310-I
Product Name: DEBUG TRES
EPA Receipt Date: 11-Mar-2015
EPA Company Number: 70310
Company Name: AGRO LOGISTIC SYSTEMS INC

SHYAM K CHARI
AGRO LOGISTIC SYSTEMS INC
PO Box 5799
DIAMOND BAR, CA 91765

SUBJECT: Receipt of Application and 75% Small Business Waiver Request

Dear Registrant:

The Office of Pesticide Programs has received your application, 75% small business waiver request, and certification of payment. If you submitted data with this application, the results of the PRN-2011-3 screen will be communicated separately. During the administrative screen, the Office of Pesticide Programs has determined that this Action is subject to a Pesticide Registration Service Fee as defined in the Pesticide Registration Improvement Act.

The Action has been identified as Action Code: B672

NEW PRODUCT;MICROBIAL/BIOCHEMICAL;UNREGISTERED SOURCE OF ACTIVE INGREDIENT;TIER I DATA REQUIREMENTS FOR PRODUCT CHEMISTRY, TOXICOLOGY, NON-TARGET ORGANISMS & PRODUCT PERFORMANCE MUST BE ADDRESSED WITH PRODUCT-SPECIFIC DATA OR REQUESTS FOR DATA WAIVERS WITH SUPPORTING SCIENCE;NO DATA COMPENSATION ISSUES;NON-FOOD USE OR FOOD USE HAVING ESTABLISHED TOLERANCE OR TOLERANCE EXEMPTION;

Your request for waiver has been forwarded for review. You will be notified in writing when a determination is made regarding your request. If your waiver request is approved, the decision review time period will start on the date of approval. If your waiver request is denied, you will receive an invoice for the outstanding balance.

If you have any questions, please contact the Pesticide Registration Service Fee Ombudsman at (703) 347-0107.

Sincerely,
Teresa Downs
Front End Processing Staff
Information Technology & Resources Management Division

Downs, Teresa

From: notification@pay.gov
Sent: Thursday, March 19, 2015 1:14 PM
To: Downs, Teresa
Subject: Pay.gov Payment Confirmation: PRIA Service Fees

Your payment has been submitted to Pay.gov and the details are below. If you have any questions regarding this payment, please contact Michael Yanchulis at (703) 347-0237 or yanchulis.michael@epa.gov.

Application Name: PRIA Service Fees
Pay.gov Tracking ID: 25KCQEHP
Agency Tracking ID: 74772732257
Transaction Type: Sale
Transaction Date: 03/19/2015 01:13:39 PM EDT

Account Holder Name: SHYAM CHARI

Transaction Amount: \$955.00
Billing Address: 2145 INDIAN CREEK ROAD
Billing Address 2:
City: DIAMOND BAR
State/Province: CA
Zip/Postal Code: 91765
Country: USA
Card Type: MasterCard
Card Number: *****9721

Registration Number: 70310-I
Company Name: AGRO LOGISTIC SYSTEMS INC
Company Number: 70310
Action Code: B672

THIS IS AN AUTOMATED MESSAGE. PLEASE DO NOT REPLY.

Fee for Service

70
{965497 ~

This package includes the following

☒ New Registration

☐ Amendment

☒ Studies? ☒ Fee Waiver?

☐ volpay % Reduction: 75

for Division

☐ AD

☒ BPPD

☐ RD

Risk Mgr.

91

Receipt No.

S-

965497

EPA File Symbol/Reg. No.

70310-I

Pin-Punch Date:

3/12/2015

☐ This item is NOT subject to FFS action.

Action Code:

Requested:

B670

Granted:

B670

Amount Due: \$ 8683

Parent/Child Decisions:

☒ Inert Cleared for Intended Use

☐ Uncleared Inert in Product

Reviewer: Andrew Bryce Land

Date: 3-18-15

R Application is B672 not B670. The B670 action code interpretation and to footnote 2 of the B670 PRIA fee category for BPPD. Which states, "An application for a new end-use product using a source of active ingredient that (a) is not yet registered but (b) has an application pending with the Agency for review, will be considered an application for a new product with an unregistered source of active ingredient." This product is being formulated with manufacturing use product which the application is pending w/ the Agency.

Receipt for Section 3

S: 965497

Milestone Email:

Regulatory Type: Product Registration - Section 3

Resubmission: ☐ Yes ☒ No

Application Type: New Registration

Fee For Service: ☒ Yes ☐ No

Billable: ☒ Yes ☐ No

Company: 70310 AGRO LOGISTIC SYSTEMS INC

V

Print Letter

Enter More Information

Tracking

Risk Manager: Biologicals & Pollution Prevention Division, PM Team 91

Product #: 70310-I Product Name: DEBUG TRES

Override#:

Me Too

Me Too Product

Section3:

Name:

Application Date: 06-Mar-2015



OPP Rec'd Date: 11-Mar-2015



Front End Date: 12-Mar-2015



Risk Manager Send Date:



FFS Due Date:

Negotiated Due Date:

OPP Target Date:

Fast Track: ☐

New Ingredient: ☐

Receipt Description:

NEW REGISTRATION WITH STUDIES

Receipt Content

Study

CSF

View/Edit

Form A: ☐

Signature Date:

Form B: ☐

Signature Date:

Menu



B670 PRIA Fee Category

PRIA 3 Fee Determination Decision Tree:

Biochemical or Microbial Biopesticide Active Ingredient - New Product Registration

Below is the fee for your selected Fee Category for Fiscal Years 2014/2015

Action Code	Description	FY14/15 Fee	Decision Time (months)
B670	New product; registered source of active ingredient(s); no change in an established tolerance or tolerance exemption; requires: 1) submission of product specific data; or 2) citation of previously reviewed and accepted data; or 3) submission or citation of data generated at government expense; or 4) submission or citation of a scientifically-sound rationale based on publicly available literature or other relevant information that addresses the data requirement; or 5) submission of a request for a data requirement to be waived supported by a scientifically-sound rationale explaining why the data requirement does not apply. (2)	\$ 4,863	7

PRIA Decision Tree

Go to the start of the Decision Tree

Do you plan to request either of the following types of waivers?

50% waiver You pay ---->>>>\$ 2,432

75% waiver You pay ---->>>>\$ 1,216

To pay the fee shown above, go to Paying PRIA Application Fees web page and follow the instructions.

How to submit your application directly to EPA.

Action Code Interpretation

An application for registration of a microbial or biochemical pesticide product that is not substantially similar or identical in its uses and/or formulation to products that are currently registered and, which contains a registered source of active ingredient. If the proposed new product contains an unregistered source of active ingredient, then see category B672. These applications require product specific chemistry data, acute toxicity data and other Tier I mammalian and non-target toxicity data as determined by the general use patterns for the product. When public health pests are claimed, efficacy (product performance) data for the product must be submitted. Formulator's exemption for the data requirements can be claimed when the source of the TGAI is registered by another pesticide registrant. If the registered source of the active ingredient is owned by the current applicant, Formulator's exemption is not applicable. The data used to support the registered source is instead referenced on the applicant's data matrix. This category is not for a new use.

All of the inerts used in the product must be either approved or pending with the Agency for the applicable uses.

An application for a new end-use product using a source of active ingredient that is not yet registered but has an application pending with the Agency for review, will be considered an application for a new product with an unregistered source of an active ingredient.

Go to the start of the Decision Tree

Last updated on November 17, 2014

**Receipt****Your payment is complete**

Pay.gov Tracking ID: 25K5C5D6

Agency Tracking ID: 74764960340

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Debit or credit card

Payment Amount: \$1,215.75

Transaction Date: 03/05/2015 03:25:14 PM EST

Payment Date: 03/05/2015

Registration Number: 70310-I

Company Name: AGRO LOGISTIC SYSTEME INC

Company Number: 70310

Action Code: B670

Account Information

Card Holder Name: SHYAM CHARI

Billing Address: 2145 Indian Creek Road

Billing Address 2:

City: Diamond Bar

Country: United States

State/Province: CA

ZIP/Postal Code: 91765

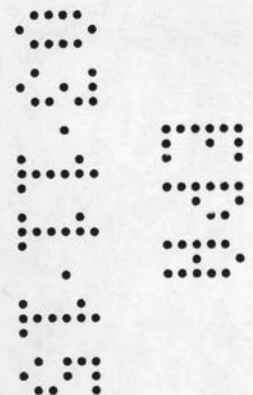
Card Type: Master Card

Card Number: *****9721

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

shyam@agrologistic.com





United States
Environmental Protection Agency
Washington, DC 20460

☒ Registration
☐ Amendment
☐ Other

OPP Identifier Number

Application for Pesticide - Section I

1. Company/Product Number 70310/70310-I	2. EPA Product Manager Linda Hollis	3. Proposed Classification <input checked="" type="checkbox"/> None <input type="checkbox"/> Restricted
4. Company/Product (Name) Agro Logistic Systems, Inc./Debug Tres	PM# 91	
5. Name and Address of Applicant (Include ZIP Code) Agro Logistic Systems, Inc., P.O. Box 5799 Diamond Bar, CA 91765 <input type="checkbox"/> Check if this is a new address	6. Expedited Review. In accordance with FIFRA Section 3(c)(3) (b)(i), my product is similar or identical in composition and labeling to: EPA Reg. No. _____ Product Name _____	

Section - II

<input type="checkbox"/> Amendment - Explain below.	<input type="checkbox"/> Final printed labels in response to Agency letter dated _____
<input type="checkbox"/> Resubmission in response to Agency letter dated _____	<input type="checkbox"/> "Me Too" Application.
<input type="checkbox"/> Notification - Explain below.	<input checked="" type="checkbox"/> Other - Explain below.

Explanation: Use additional page(s) if necessary. (For section I and Section II.)

Application for registration of Debug Tres, a new end use product, under PRIA Category B670.

Section - III

1. Material This Product Will Be Packaged In:				2. Type of Container	
Child-Resistant Packaging <input type="checkbox"/> Yes* <input checked="" type="checkbox"/> No	Unit Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Soluble Packaging <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		<input checked="" type="checkbox"/> Metal	
* Certification must be submitted				<input type="checkbox"/> Plastic	
	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	<input type="checkbox"/> Glass	
			No. per container	<input type="checkbox"/> Paper	
				<input type="checkbox"/> Other (Specify) _____	
3. Location of Net Contents Information <input checked="" type="checkbox"/> Label <input type="checkbox"/> Container		4. Size(s) Retail Container 1gal, 2.5gal		5. Location of Label Directions <input checked="" type="checkbox"/> On Label <input type="checkbox"/> On Labeling accompanying product	
6. Manner in Which Label is Affixed to Product glued		<input type="checkbox"/> Lithograph <input type="checkbox"/> Paper glued <input type="checkbox"/> Stenciled		<input type="checkbox"/> Other _____	

Section - IV

1. Contact Point (Complete items directly below for identification of individual to be contacted, if necessary, to process this application)		
Name Shyam K. Chari	Title President	Telephone No. (Include Area Code) (714) 990-9220
Certification I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.		6. Date Application Received (Stamped)
2. Signature 	3. Title President	
4. Typed Name Shyam K. Chari	5. Date 6 March 2015	



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.
Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

 **ORIGINAL**

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Linda Hollis, Chief, Biochemical Pesticides Branch
Biopesticides and Pollution Prevention Division (7511P)
Office of Pesticide Programs, EPA
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

March 6, 2015

RE: **Application for New Product Registrations**
File Symbol 70310-A: Debug Aza MUP, PRIA Category B673
File Symbol 70310-T: Debug Optimo, PRIA Category B670
File Symbol 70310-I: Debug Tres, PRIA Category B670

Dear Ms. Hollis:

Agro Logistic Systems, Inc. (EPA Co. No. 70310), hereby submits three applications for new product registration. The first application is for a manufacturing use product, Debug Aza MUP (File Symbol 70310-A). The other two applications are for new end-use products, Debug Optimo (File Symbol 70310-T) and Debug Tres (File Symbol 70310-I).

This application fits under PRIA Category B673 for the registration of the MUP (new MUP, unregistered source of active ingredient, citation of TGAI data previously reviewed and accepted by the Agency) and B670 for the two new end use products with registered sources of active ingredients. A small business 75% waiver of the required PRIA fees is requested, and appropriate documentation is included. Enclosed you will find the following in support of each of the three applications:

- 1) Application form;
- 2) Online payment confirmation;
- 3) Small Business Waiver documentation;
- 4) Confidential Statement of Formula;
- 5) Certification with Respect to Citation of Data form;
- 6) Data Matrix, including a publicly releasable "blacked-out" version;
- 7) Five (5) copies of the product label;
- 8) Data Volumes 1 through 3 – refer to the Transmittal Document for a complete listing of data volume titles and corresponding OPPTS Guideline Numbers.
- 9) Shelf Life (Storage Stability) study

Debug TURBO
222



**AGRO
LOGISTIC SYSTEMS INC.**

555 W. Lambert Road, Unit - N, Brea, CA 92821.

Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

10) 5-Batch Analysis

Please note the following with regards to this application:

- a. **Identity of the Products.** Debug Aza MUP is a new manufacturing use product. Debug Optimo and Debug Tres are new end-use fungicide and bactericide product containing registered active ingredients and formulated with minimum risk inert ingredients. Debug Tres also contains the new Debug Aza MUP.
- b. **Product Chemistry Data.** A complete set of product chemistry data for each product is submitted with these applications – refer to Volume 2 of each product submission.
- c. **Human Health Toxicity Data.** Scientifically sound data rationales have been submitted for all human health toxicity data requirements for each product – refer to Volume 3 of each submission. Data waiver rationales are based on toxicity information available on the active ingredients, inert ingredients, and their breakdown products, as well as a discussion on potential human exposure, or lack thereof.

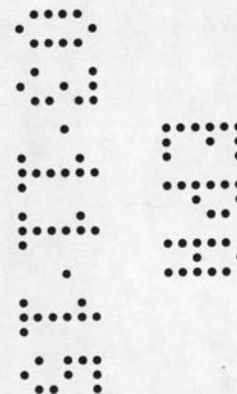
With this application, we believe all biochemical pesticide Tier 1 data requirements for new MUP and end-use products have been fulfilled. Please contact me if there are any questions or comments.

Respectfully,

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799

Diamond Bar, CA 91765

Tel. (714) 990-9220; email: shyam@agrologistic.com



Debug TURBO

VOLUME 1 OF 3 OF SUBMISSION
TRANSMITTAL DOCUMENT

NAME AND ADDRESS OF SUBMITTER:

Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765

REGULATORY ACTION:

PRIA B670 Application for Registration of **Debug Tres**

TRANSMITTAL DATE:

March 6, 2015


LIST OF SUBMITTED STUDIES:

MRID NUMBER	VOLUME NUMBER	EPA STUDY TITLE	OCSPP GUIDELINE NUMBER
	1 of 3	Transmittal Document, Admin Documents	-----
	2 of 3	Product Chemistry for Debug Tres	880.1100 880.1200 830.1750
	3 of 3	Response to Tier 1 Biochemical Pesticide Data Requirements for Debug Tres	870.1100 870.1200 870.1300 870.2400 870.2500 870.2600

COMPANY NAME:

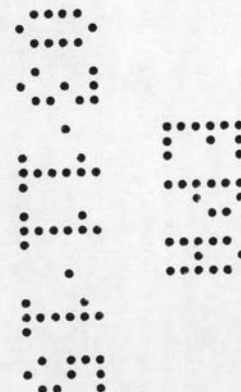
Agro Logistic Systems, Inc.

COMPANY OFFICIAL:


Shyam K. Chari, President

COMPANY CONTACT:

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com





**AGRO
LOGISTIC SYSTEMS INC.**

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Ph: 714-990-9220, Fax: (714) 990-9222 www.agrologistic.com

Shyam K. Chari, President
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
Tel. (714) 990-9220; email: shyam@agrologistic.com

Michael Yanchulis
Information Services Branch
U.S. EPA Office of Pesticide Programs
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

March 6, 2015

Subject: Agro Logistic Systems, Inc. – Voluntary Small Business Certification

Dear Mr. Yanchulis,

Agro Logistic Systems is requesting a 75% fee reduction on three new product submissions and, in support of this request, is providing the following information about the company:

Pending Registration Applications:

Debug Aza MUP, EPA File Symbol 70310-A, PRIA B673

Debug Optimo, EPA File Symbol 70310-T, PRIA B670

Debug Tres, EPA File Symbol 70310-I, PRIA B670

Company Location, Revenue, and Number of Employees:

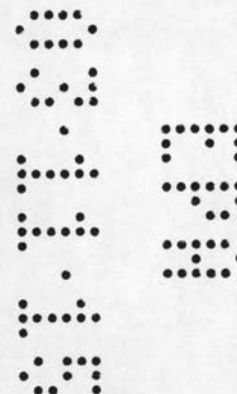
Street address: 555 West Lambert Road, Unit "N", Brea, CA 92821

Mailing address: P.O. Box 5799, Diamond Bar, CA 91765

Year	Revenue	Employees
2010	<\$10,000,000	<20
2011	<\$10,000,000	<20
2012	<\$10,000,000	<20
2013	<\$10,000,000	<20

Respectfully,

Shyam K. Chari, President





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

1200 Pennsylvania Avenue, N.W.
WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form to this address.

Certification with Respect to Citation of Data

Applicant's/Registrant's Name, Address, and Telephone Number
Agro Logistic Systems, Inc., P.O. Box 5799, Diamond Bar, CA 91765

EPA Registration Number/File Symbol
70310-I

Active Ingredient(s) and/or representative test compound(s)
azadirachtin, fats and glyceridic oils, margosa

Date
March 6, 2015

General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158)
fungicide, insecticide, miticide, nematocide

Product Name
Debug Tres

NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statement (EPA Form 8570-27).

☐ I am responding to a Data-Call-In Notice, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

SECTION I: METHOD OF DATA SUPPORT (Check one method only)

☐ I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).

☒ I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).

SECTION II: GENERAL OFFER TO PAY

[Required if using the cite-all method or when using the cite-all option under the selective method to satisfy one or more data requirements]

☐ I hereby offer and agree to pay compensation, to other persons, with regard to the approval of this application, to the extent required by FIFRA.

SECTION III: CERTIFICATION

I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses.

I certify that for each exclusive use study cited in support of this registration or reregistration, that I am the original data submitter or that I have obtained the written permission of the original data submitter to cite that study.

I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (i) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.

I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.

I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.

Signature

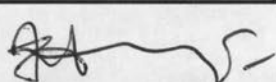
Date
6 March 2015

Typed or Printed Name and Title
Shyam K. Chari, President

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The Public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPP Information Management Division (2137)U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.


DATA MATRIX

Date March 6, 2015			EPA Reg. No./File Symbol 70310-I	Page 1 of 1	
Applicant's/Registrant Name and Address Agro Logistic Systems, Inc. P.O. Box 5799 Diamond Bar, CA 91765			Product Debug Tres		
Ingredient Azadirachtin, Fats and Glyceridic Oils, Margosa					
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
OPPTS 880.1100	Product Identity and Composition		Agro Logistic Systems, Inc.	OWN	
OPPTS 880.1200	Description of Starting Materials, Production and Formulation Processes		Agro Logistic Systems, Inc.	OWN	
OPPTS 830.1750	Certified Limits		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1100	Acute Oral Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1200	Acute Dermal Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.1300	Acute Inhalation Toxicity		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2400	Primary Eye Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2500	Primary Dermal Irritation		Agro Logistic Systems, Inc.	OWN	
OPPTS 870.2600	Dermal Sensitization		Agro Logistic Systems, Inc.	OWN	
Signature 			Name and Title Shyam K. Chari, President		Date March 6, 2015

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
401 M Street, S.W. WASHINGTON, D.C. 20460

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			Agro Logistic Systems, Inc.	OWN	
Signature 			Name and Title Shyam K. Chari, President		Date March 6, 2015

Master Label[●] Debug[®]Trés

Page 1 of 6

Sub-label A: For Agriculture, Horticulture & Greenhouses, Golf Courses, Turf, & Ornamentals

Sub-label B: For Home Gardens

Emulsifiable Concentrate

**AGRICULTURAL, HORTICULTURAL, GREENHOUSE, AND OUTDOOR
DOMESTIC TERRESTRIAL PESTICIDE**

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
U.S.A.

TEL: (714) 990-9220
e-mail: info@agrologistic.com
Website: www.agrologistic.com

Net contents: [4 Fl. Oz.]/ [8 Fl. Oz.]/ [32 Fl. Oz.]/ [1 Gal]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if absorbed through skin or if inhaled.
Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators, Mixers and other handlers must wear

-Coveralls

- Socks, shoes, and

-Chemical resistant gloves.

Follow manufacturer's instructions for

cleaning/maintaining PPE. If no such instructions for

washables use detergent and hot water. Keep and

wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark.

Do not contaminate water when disposing of equipment washwater or rinsate.

This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

Batch No:

Manufacturing Date:

Expiry Date:

PRODUCT OF INDIA

MANUFACTURED FOR

Agro Logistic Systems, Inc.

P.O. Box 5799, Diamond Bar, CA 91765,
U.S.A.

TEL: (714) 990-9220

Website: www.agrologistic.com

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No.070310-IND-
002

Sub-label A: Agriculture, Horticulture, Greenhouse, Golf Courses, Turf, Parks & Ornamentals

Debug®Trés

Emulsifiable Concentrate

Antifeedant, Insect Repellent,

Insecticide, Miticide, Fungicide & Nematicide



FOR ORGANIC PRODUCTION

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

4.70%

Azadirachtin

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30AM to 4:30PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

Net contents: [4 Fl. Oz]/[8 Fl. Oz]/[32 Fl. Oz]/[1 Gal]

DIRECTIONS FOR

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is:

- Coveralls
- Chemical resistant gloves, such as barrier laminates or butyl rubber or nitrile rubber or PVC.
- Shoes and socks

NON- AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the Worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used on agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate. For Commercial Agricultural Use:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly and emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

DEBUG TRÉS
PLEASE READ THE FOLLOWING INFORMATION
CAREFULLY BEFORE USING DEBUG TRÉS

TANK MIXING:

'DEBUG TRÉS is compatible with commonly used insecticides, fungicides and foliar fertilizers. Do not use Debug Trés with Bordeaux mixture, lime sulfur or other highly alkaline materials.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. This product is damaged by oxidants. Do not mix acids and bleaches with DEBUG TRÉS.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with DEBUG TRÉS.
2. Fill tank with appropriate amount of water.
3. Add the pre-measured amount of DEBUG TRÉS.
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing DEBUG TRÉS with other pesticides.

SPRAYING DIRECTIONS:

Spray DEBUG TRÉS using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. Use a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. Use horizontal nozzles at 10- inch spacing and two vertical drops, one at each end. Each vertical drop must have two nozzles, one at 90° angle and the other at 45° angle. The water used for mixing should have a pH at about 5.5 for DEBUG TRÉS to be most effective. If necessary, use a buffer to bring the pH to the desired level.

1. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.
2. AERIAL APPLICATIONS: DEBUG TRÉS may be aerially applied using suitable equipment such as fixed-wing aircraft or helicopters

CHEMIGATION DIRECTIONS

GENERAL CHEMIGATION REQUIREMENTS:

- A. Apply this product only through sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation system.
- B. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- C. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- D. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- E. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
5. Do not apply when wind speed favors drift beyond the area intended for treatment.
6. Agitation is generally recommended in the pesticide supply tank.
7. Apply this product continuously for the duration of the water application.
8. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
9. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

DRIP (TRICKLE) CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Agitation is generally recommended in the pesticide supply tank.
8. Apply this product continuously for the duration of the water application.
9. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
10. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

For Golf Courses, Turf, Parks & Ornamentals
NEMATODE, AND TURF INSECT CONTROL

For Organic Turf Use. Controls many insects including: Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, Cabbage loopers, Armyworms, Colorado potato beetles, Diamondback moths, Grasshoppers, Maggots, Weevils, Chafers, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. SHAKE THIS CONTAINER WELL BEFORE USE.

2A. FOR NEMATODE CONTROL: (Ornamentals and Turf)

MIX 10 to 15 FL. OZ OF DEBUG TRÉS WITH 2 TO 30 GALLONS WATER TO SPRAY ON 1000 SQUARE FEET. Using sprinklers, deliver additional amounts of water to push the material to the required depth below ground level. Apply every week or as needed. Test the soil every month for nematode count. Repeat application if the nematode count is over the threshold limit.

2B. FOR INSECT AND WORM CONTROL (see above list):

MIX 0.3 to 0.6 FL. OZ. OF DEBUG TRÉS IN 2 TO 3 GALLONS OF WATER. 10 FL. OZ. to 22.5 FL. OZ. of Debug Trés with 100 gallons water per acre). Ensure that pH of this mixture is around 5.5 by using a buffer. Spray the mixture on to 1000 square feet of turf. Using sprinklers or other means, deliver additional amounts of water to push the material to ¼ inch - ½ inch below ground level. For worm and insect control apply at the earliest sign of infestation. Repeat the application at 7- 10 days interval if infestation persists.

3. SPRAY DEBUG TRÉS IN THE EARLY MORNING OR LATE AFTERNOON.
4. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.
5. USE AS A PREVENTATIVE TO KEEP INSECTS AWAY.

GENERAL:

- DEBUG TRÉS is more effective when used as a preventative.
- DEBUG TRÉS is a broad-spectrum herbal insecticide.
- DEBUG TRÉS affects the insects at all stages of growth.
- SHAKE THE CONTAINER WELL, BEFORE USE.
- IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION.

WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage or handling of this material not in strict accordance with directions given herein.

CROPS

Top fruits such as Citrus, Lemons, Oranges, Grapefruits, Pummalo, Apples, Plums, Peaches, Apricots, Avocados, Figs, Prunes, Nectarines, Pears. Mangoes, Cherries, Kiwifruit, Kumquats, Loquats, Quinces, Persimmons, and Palm. Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, Gourds, Bitter melons, Chayote, Okra, Asparagus, and Melons. Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, Kohlrabi, Chard, Collard, Amaranth, and Spinach.

Root and Tuber vegetables such as Beets, Carrots, Ginger, Radish, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, Ginseng, Rutabagas, Watercress, Artichokes and Turmeric. Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.

Cereals such as Barley, Corn, Millet, Rice, Rye, Sorghum, Triticale, Oats, and Wheat.

Alfalfa and other feed & forage crops. Grasses

Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, and Eggplant.

Berries such as, Blackberries, Blueberries, Currants, Strawberries, Cane berries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries Grapes

Tropical fruits such as Banana, Cherimoyas, Mangoes, Guavas, Papayas and Pineapple.

Cotton and oilseeds such as Canola, Sesame, Rapeseed, Sunflower, Safflower, Olive, Peanut and Jojoba

Herbs & Spices including but not limited to Mints, Anise, Basil, Chives, Coriander, Dill, Fennel, Marigold, Sage, and Thyme.

Mushrooms, such as: Agaricus, Bella, Enoki, Maitake, Oyster, Shitake, and other specialty mushrooms

Nuts such as Almonds, Pecans, Pistachios, Cashews, Chestnuts, Macadamia, Hazelnuts, Brazil nut, Water chestnuts, and Walnuts.

Coffee, Tea, Tobacco and Sugarcane.

Greenhouse Crops including ornamentals such as Chrysanthemums, Poinsettias, Roses, Lilies, Geraniums, Daisies, Carnations, Salvias and Dahlias.

All starter vegetables and fruit crops.

INSECT

PESTS/MITES/DISEASES/NEMATODES

Aphids

Armyworms

Fall Armyworms

Beetles, Beanleaf Beetles, Cucumber Beetles, Japanese Beetles, Mexican Beetles, Colorado Potato Beetles, Potato Flea Beetles, Corn beetles, Flea Beetles

Borers, Budworms.

Casebearers, Caterpillars, Codling Moth

Fruit Flies

Gnats, Fungus Gnats, Grasshoppers, Grubs

Leaf Hoppers, Leaf Perforators, Leafminers,

Leafrollers, Loopers, Cabbage loopers, Lygus Bug

Maggots, Onion Maggots, Mealy Bugs, Mealybugs,

Mildew, Rust and Powdery Mildew, Mites, Two

Spotted Spidermites, Pacific Spider Mites, Moths,

Diamondback Moths, Gypsy Moths, Grape Berry

Moths, Nematodes

Orange Toxix

Phylloxera, Phythium, Psylla, Psyllids

Rhizoctonia Solani

Scales, San Jose Scale

Sclerotinia Sclerotiorum

Sclerotium Rolfsii

Sharpshooters

Sucker Ants

Thrips

Weevils, Pepper Weevils, Boll weevils

Whiteflies

Worms

Wireworms

Webworms

Budworms

Alfalfa Worms

Boll Worms

Pickle Worms

Fagot Worms, Root Worms, Ear Worms, Cut

Worms

DIRECTIONS FOR CROP APPLICATIONS

PREVENTATIVE APPLICATION: APPLICATION RATES ARE FOR ONE ACRE EXCEPT AS NOTED.

As a preventative application mix 4 to 8 Fl. Oz. of Debug Trés in 50 to 100 gallons water or sufficient amount of water to ensure total foliar coverage. Start applying when the plants are tall enough to be susceptible to infestation. Use the following:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 7 to 10 days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 10 to 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 10 to 15 days.
(For fruit trees use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water)
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 10 to 15 days.
(For berries use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water).
- For **Grasses and Forage Crops like Alfalfa**, apply in spring, approximately 2 weeks after dormancy period is over, and repeat every 10 to 15 days.

STANDARD APPLICATION : ALL APPLICATION RATES ARE FOR ONE ACRE

5 Fl. Oz. to 15 Fl. Oz. of Debug Trés mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying at early plant stage use dilution of 5 fl. Oz. to 10 fl. Oz. of Debug Trés with 50 gallons of water. When applying in high population crops like berries and fruit trees, use dilution of 12 Fl. Oz. to 22.5 Fl. Oz. of Debug Tres with 150 to 300 gallons of water.

Repeat application at 7 to 14 day intervals, at least once and if necessary additional times.

For Greenhouse crops Prepare a 0.5% - 0.75% (0.50 oz - 1.0 oz./ Gal) solution of Debug Trés in water and completely drench the plants. Repeat every 5 to 7 days till infestation clears.

For NEMATODE CONTROL use 12 oz to 22.5 oz. Debug Trés in 500- 1500 Gallons water per acre as a drench or drip. Repeat applications at the same rate as needed.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (22.5 FL. OZ. OF DEBUG TRÉS E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119 FOR AZADIRACTIN. FATS, AND GLYCERIDIC OILS MARGOSA (NEEM OIL) IS EXEMPT FROM THE REQUIREMENT OF A TOLERANCE AS PER 40 CFR 180.1291

Agro Logistic Systems, Inc.
P.O.Box: 5799

Diamond Bar, CA 91765, U.S.A.

TEL: (714) 990-9220; FAX: (714) 990-9222

e-mail: info@agrologistic.com

website: www.agrologistic.com

EPA REGISTRATION NO: 70310-I

EPA ESTABLISHMENT NO: 070310-IND-002

Sub-label B: For Home Gardens

Debug®Trés

For Indoor and Outdoor Use

For Organic Gardening

From the Neem Tree

**Ideal for Flower Beds, Vegetable Gardens, Lawns & Fruit Trees
Including indoor and outdoor plants grown in containers.**

Antifeedant, Insect Repellent, Insecticide, Miticide, Fungicide & Nematicide

Controls many insects including:

Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, loopers, Armyworms, Grasshoppers, Maggots, Weevils, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium etc.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

4.70%

Azadirachtin

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

Net contents: [0.16 Fl. Oz]/[1 Fl. Oz]/[4 Fl. Oz]/[8 Fl. Oz]/[16 Fl. Oz]/[24 Fl. Oz]/[32 Fl. Oz]

REGISTRATION No. 70310-I
EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765, U.S.A.
Tel: (714) 990-9220

PLEASE REFER TO THE FRONT PANEL FOR FIRST AID INSTRUCTIONS
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE) required for this product are long-sleeve shirt and long pants, socks, shoes, and chemical resistant gloves.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. **SHAKE THIS CONTAINER WELL BEFORE USE.**
2. **MIX 5 ML to 10 ML (1 to 2 TEASPOONS) OF DEBUG TRÉS WITH 24 TO 32 FL. OZ. WATER IN A SPRAY CONTAINER. SHAKE WELL.**
3. **SPRAY THE MIXTURE ON THE LEAVES AND STEMS, INCLUDING THE UNDERSIDE OF LEAVES SO AS TO COMPLETELY DRENCH THE PLANT.**
4. **SPRAY DEBUG TRES EARLY IN THE MORNING OR LATE AFTERNOON.**
5. **USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.**
6. **FOR BEST RESULTS, APPLY WEEKLY (OR MORE FREQUENTLY IF INFESTATION PERSISTS).**
7. **USE AS PREVENTATIVE TO KEEP INSECTS AWAY.**
8. **DO NOT WASH THE LEAVES FOR 24 HOURS AFTER SPRAYING.**
9. **FOR LAWN CARE, APPLY 10 ml (2 TEASPOONS) TO 20 ml (4 TEASPOONS) OR LESS OF CONCENTRATE PER 100 SQ. FT. PER APPLICATION.**
10. **IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION**

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's attention that the buyer assumes risk of use, storage, or handling of this material not in strict accordance with directions given herein.

Manufacturing Date:

Expiry Date:

Product of India

Master Label Debug®Trés

Page 1 of 6

Sub-label A: For Agriculture, Horticulture & Greenhouses, Golf Courses, Turf, & Ornamentals

Sub-label B: For Home Gardens

Emulsifiable Concentrate

**AGRICULTURAL, HORTICULTURAL, GREENHOUSE, AND OUTDOOR
DOMESTIC TERRESTRIAL PESTICIDE**

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
U.S.A.

TEL: (714) 990-9220
e-mail: info@agrologistic.com
Website: www.agrologistic.com

Net contents: [4 Fl. Oz.]/ [8 Fl. Oz.]/ [32 Fl. Oz.]/ [1 Gal]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if absorbed through skin or if inhaled.
Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators, Mixers and other handlers must wear

-Coveralls

- Socks, shoes, and

-Chemical resistant gloves.

Follow manufacturer's instructions for

cleaning/maintaining PPE. If no such instructions for

washables use detergent and hot water. Keep and

wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

Batch No:

Manufacturing Date:

Expiry Date:

PRODUCT OF INDIA

MANUFACTURED FOR

Agro Logistic Systems, Inc.

P.O. Box 5799, Diamond Bar, CA 91765,

U.S.A.

TEL: (714) 990-9220

Website: www.agrologistic.com

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No.070310-IND-

002

Sub-label A: Agriculture, Horticulture, Greenhouse, Golf Courses, Turf, Parks & Ornamentals

Debug®Trés

Emulsifiable Concentrate

Antifeedant, Insect Repellent,

Insecticide, Miticide, Fungicide & Nematicide



FOR ORGANIC PRODUCTION

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

4.70%

Azadirachtin

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30AM to 4:30PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

Net contents: [4 Fl. Oz]/[8 Fl. Oz]/[32 Fl. Oz]/[1 Gal]

DIRECTIONS FOR

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is:

- Coveralls
- Chemical resistant gloves, such as barrier laminates or butyl rubber or nitrile rubber or PVC.
- Shoes and socks

NON- AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used on agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate. For Commercial Agricultural Use:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

DEBUG TRÉS
READ THE FOLLOWING INFORMATION
BEFORE USING DEBUG TRÉS

TANK MIXING:

'DEBUG TRÉS is compatible with commonly used insecticides, fungicides and foliar fertilizers. Do not use Debug Trés with Bordeaux mixture, lime sulfur or other highly alkaline materials.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. This product is damaged by oxidants. Do not mix acids and bleaches with DEBUG TRÉS.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with DEBUG TRÉS.
2. Fill tank with appropriate amount of water.
3. Add the pre-measured amount of DEBUG TRÉS.
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing DEBUG TRÉS with other pesticides.

SPRAYING DIRECTIONS:

Spray DEBUG TRÉS using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. Use a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. Use horizontal nozzles at 10- inch spacing and two vertical drops, one at each end. Each vertical drop must have two nozzles, one at 90° angle and the other at 45° angle. The water used for mixing should have a pH at about 5.5 for DEBUG TRÉS to be most effective. If necessary, use a buffer to bring the pH to the desired level.

1. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.
2. AERIAL APPLICATIONS: DEBUG TRÉS may be aerially applied using suitable equipment such as fixed-wing aircraft or helicopters

CHEMIGATION DIRECTIONS

GENERAL CHEMIGATION REQUIREMENTS:

- A. Apply this product only through sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation system.
- B. Crop injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- C. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- D. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- E. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops". The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected". Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
5. Do not apply when wind speed favors drift beyond the area intended for treatment.
6. Agitation is generally recommended in the pesticide supply tank.
7. Apply this product continuously for the duration of the water application.
8. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
9. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

DRIP (TRICKLE) CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Agitation is generally recommended in the pesticide supply tank.
8. Apply this product continuously for the duration of the water application.
9. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
10. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

For Golf Courses, Turf, Parks & Ornamentals
NEMATODE, AND TURF INSECT CONTROL

For Organic Turf Use. Controls many insects including: Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, Cabbage loopers, Armyworms, Colorado potato beetles, Diamondback moths, Grasshoppers, Maggots, Weevils, Chafers, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. SHAKE THIS CONTAINER WELL BEFORE USE.

2A. FOR NEMATODE CONTROL: (Ornamentals and Turf)

MIX 10 to 15 FL. OZ OF DEBUG TRÉS WITH 2 TO 30 GALLONS WATER TO SPRAY ON 1000 SQUARE FEET. Using sprinklers, deliver additional amounts of water to push the material to the required depth below ground level. Apply every week or as needed. Test the soil every month for nematode count. Repeat application if the nematode count is over the threshold limit.

2B. FOR INSECT AND WORM CONTROL (see above list):

MIX 0.3 to 0.6 FL. OZ. OF DEBUG TRÉS IN 2 TO 3 GALLONS OF WATER. 10 FL. OZ. to 22.5 FL. OZ. of Debug Trés with 100 gallons water per acre). Ensure that pH of this mixture is around 5.5 by using a buffer. Spray the mixture on to 1000 square feet of turf. Using sprinklers or other means, deliver additional amounts of water to push the material to ¼ inch - ½ inch below ground level. For worm and insect control apply at the earliest sign of infestation. Repeat the application at 7- 10 days interval if infestation persists.

3. SPRAY DEBUG TRÉS IN THE EARLY MORNING OR LATE AFTERNOON.
4. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.
5. USE AS A PREVENTATIVE TO KEEP INSECTS AWAY.

GENERAL:

- DEBUG TRÉS is more effective when used as a preventative.
- DEBUG TRÉS is a broad-spectrum herbal insecticide.
- DEBUG TRÉS affects the insects at all stages of growth.
- SHAKE THE CONTAINER WELL, BEFORE USE.
- IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION.

WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage or handling of this material not in strict accordance with directions given herein.

CROPS

Top fruits such as Citrus, Lemons, Oranges, Grapefruits, Pummalo, Apples, Plums, Peaches, Apricots, Avocados, Figs, Prunes, Nectarines, Pears. Mangoes, Cherries, Kiwifruit, Kumquats, Loquats, Quinces, Persimmons, and Palm. Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, Gourds, Bitter melons, Chayote, Okra, Asparagus, and Melons. Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, Kohlrabi, Chard, Collard, Amaranth, and Spinach.

Root and Tuber vegetables such as Beets, Carrots, Ginger, Radish, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, Ginseng, Rutabagas, Watercress, Artichokes and Turmeric. Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.

Cereals such as Barley, Corn, Millet, Rice, Rye, Sorghum, Triticale, Oats, and Wheat.

Alfalfa and other feed & forage crops. Grasses

Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, and Eggplant.

Berries such as, Blackberries, Blueberries, Currants, Strawberries, Cane berries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries Grapes

Tropical fruits such as Banana, Cherimoyas, Mangoes, Guavas, Papayas and Pineapple.

Cotton and oilseeds such as Canola, Sesame, Rapeseed, Sunflower, Safflower, Olive, Peanut and Jojoba

Herbs & Spices including but not limited to Mints, Anise, Basil, Chives, Coriander, Dill, Fennel, Marigold, Sage, and Thyme.

Mushrooms, such as: Agaricus, Bella, Enoki, Maitake, Oyster, Shitake, and other specialty mushrooms

Nuts such as Almonds, Pecans, Pistachios, Cashews, Chestnuts, Macadamia, Hazelnuts, Brazil nut, Water chestnuts, and Walnuts.

Coffee, Tea, Tobacco and Sugarcane.

Greenhouse Crops including ornamentals such as Chrysanthemums, Poinsettias, Roses, Lilies, Geraniums, Daisies, Carnations, Salvias and Dahlias.

All starter vegetables and fruit crops.

INSECT

PESTS/MITES/DISEASES/NEMATODES

Aphids

Armyworms

Fall Armyworms

Beetles, Beanleaf Beetles, Cucumber Beetles,

Japanese Beetles, Mexican Beetles, Colorado

Potato Beetles, Potato Flea Beetles, Corn beetles,

Flea Beetles

Borers, Budworms.

Casebearers, Caterpillars, Codling Moth

Fruit Flies

Gnats, Fungus Gnats, Grasshoppers, Grubs

Leaf Hoppers, Leaf Perforators, Leafminers,

Leafrollers, Loopers, Cabbage loopers, Lygus Bug

Maggots, Onion Maggots, Mealy Bugs, Mealybugs,

Mildew, Rust and Powdery Mildew, Mites, Two

Spotted Spidermites, Pacific Spider Mites, Moths,

Diamondback Moths, Gypsy Moths, Grape Berry

Moths, Nematodes

Orange Totrix

Phylloxera, Phythium, Psylla, Psyllids

Rhizoctonia Solani

Scales, San Jose Scale

Sclerotinia Sclerotiorum

Sclerotium Rolfsii

Sharpshooters

Sucker Ants

Thrips

Weevils, Pepper Weevils, Boll weevils

Whiteflies

Worms

Wireworms

Webworms

Budworms

Alfalfa Worms

Boll Worms

Pickle Worms

Fagot Worms, Root Worms, Ear Worms, Cut

Worms

DIRECTIONS FOR CROP APPLICATIONS

PREVENTATIVE APPLICATION: APPLICATION RATES ARE FOR ONE ACRE EXCEPT AS NOTED.

As a preventative application mix 4 to 8 Fl. Oz. of Debug Trés in 50 to 100 gallons water or sufficient amount of water to ensure total foliar coverage. Start applying when the plants are tall enough to be susceptible to infestation. Use the following:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 7 to 10 days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 10 to 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 10 to 15 days.
(For fruit trees use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water)
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 10 to 15 days.
(For berries use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water).
- For **Grasses and Forage Crops like Alfalfa**, apply in spring, approximately 2 weeks after dormancy period is over, and repeat every 10 to 15 days.

STANDARD APPLICATION : ALL APPLICATION RATES ARE FOR ONE ACRE

5 Fl. Oz. to 15 Fl. Oz. of Debug Trés mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying at early plant stage use dilution of 5 fl. Oz. to 10 fl. Oz. of Debug Trés with 50 gallons of water. When applying in high population crops like berries and fruit trees, use dilution of 12 Fl. Oz. to 22.5 Fl. Oz. of Debug Tres with 150 to 300 gallons of water.

Repeat application at 7 to 14 day intervals, at least once and if necessary additional times.

For Greenhouse crops Prepare a 0.5% - 0.75% (0.50 oz – 1.0 oz./ Gal) solution of Debug Trés in water and completely drench the plants. Repeat every 5 to 7 days till infestation clears.

For NEMATODE CONTROL use 12 oz to 22.5 oz. Debug Trés in 500- 1500 Gallons water per acre as a drench or drip. Repeat applications at the same rate as needed.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (22.5 FL. OZ. OF DEBUG TRÉS E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119 FOR AZADIRACTIN. FATS, AND GLYCERIDIC OILS MARGOSA (NEEM OIL) IS EXEMPT FROM THE REQUIREMENT OF A TOLERANCE AS PER 40 CFR 180.1291

Agro Logistic Systems, Inc.

P.O.Box: 5799

Diamond Bar, CA 91765, U.S.A.

TEL: (714) 990-9220; FAX: (714) 990-9222

e-mail: info@agrologistic.com

website: www.agrologistic.com

EPA REGISTRATION NO: 70310-I

EPA ESTABLISHMENT NO: 070310-IND-002

Sub-label B: For Home Gardens

Debug®Trés

For Indoor and Outdoor Use
For Organic Gardening

From the Neem Tree

**Ideal for Flower Beds, Vegetable Gardens, Lawns & Fruit Trees
Including indoor and outdoor plants grown in containers.**

**Antifeedant, Insect Repellent, Insecticide, Miticide, Fungicide & Nematicide
Controls many insects including:**

Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles,
Leafhoppers, Fruit worms, Spider mites, Caterpillars, loopers, Armyworms, Grasshoppers,
Maggots, Weevils, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii,
Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium etc.

**KEEP OUT OF REACH OF CHILDREN
CAUTION**

FIRST AID

On skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

Fats and Glyceridic	
Oils Margosa	4.70%
Azadirachtin	3.00%

OTHER INGREDIENTS:	92.30%
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TOTAL:	100.00%
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0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

Net contents: [0.16 Fl. Oz]/[1 Fl. Oz]/[4 Fl. Oz]/[8 Fl. Oz]/[16 Fl. Oz]/[24 Fl. Oz]/[32 Fl. Oz]

A REGISTRATION No. 70310-I
EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765, U.S.A.
Tel: (714) 990-9220

PLEASE REFER TO THE FRONT PANEL FOR FIRST AID INSTRUCTIONS
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

Harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE) required for this product are long-sleeve shirt and long pants, socks, shoes, and chemical resistant gloves.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. **SHAKE THIS CONTAINER WELL BEFORE USE.**
2. **MIX 5 ML to 10 ML (1 to 2 TEASPOONS) OF DEBUG TRÉS WITH 24 TO 32 FL. OZ. WATER IN A SPRAY CONTAINER. SHAKE WELL.**
3. **SPRAY THE MIXTURE ON THE LEAVES AND STEMS, INCLUDING THE UNDERSIDE OF LEAVES SO AS TO COMPLETELY DRENCH THE PLANT.**
4. **SPRAY DEBUG TRES EARLY IN THE MORNING OR LATE AFTERNOON.**
5. **USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.**
6. **FOR BEST RESULTS, APPLY WEEKLY (OR MORE FREQUENTLY IF INFESTATION PERSISTS).**
7. **USE AS PREVENTATIVE TO KEEP INSECTS AWAY.**
8. **DO NOT WASH THE LEAVES FOR 24 HOURS AFTER SPRAYING.**
9. **FOR LAWN CARE, APPLY 10 ml (2 TEASPOONS) TO 20 ml (4 TEASPOONS) OR LESS OF CONCENTRATE PER 100 SQ. FT. PER APPLICATION.**
10. **IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION**

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage, or handling of this material not in strict accordance with directions given herein.

Manufacturing Date:

Expiry Date:

Product of India

Master Label Debug®Trés

Page 1 of 6

Sub-label A: For Agriculture, Horticulture & Greenhouses, Golf Courses, Turf, & Ornamentals

Sub-label B: For Home Gardens

Emulsifiable Concentrate

**AGRICULTURAL, HORTICULTURAL, GREENHOUSE, AND OUTDOOR
DOMESTIC TERRESTRIAL PESTICIDE**

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN

CAUTION

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765
U.S.A.

TEL: (714) 990-9220
e-mail: info@agrologistic.com
Website: www.agrologistic.com

Net contents: [4 Fl. Oz.]/ [8 Fl. Oz.]/ [32 Fl. Oz.]/ [1 Gal]

PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS
Harmful if absorbed through skin or if inhaled.
Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing.
Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE)

Applicators, Mixers and other handlers must wear

-Coveralls

- Socks, shoes, and

-Chemical resistant gloves.

Follow manufacturer's instructions for

cleaning/maintaining PPE. If no such instructions for washables use detergent and hot water. Keep and wash PPE separately from other laundry

USER SAFETY RECOMMENDATIONS

Users should remove clothing/PPE immediately if pesticide gets inside. Then wash thoroughly and put on clean clothing.

Users should remove PPE immediately after handling this product. Wash the outside of gloves before removing. As soon as possible, wash thoroughly and change into clean clothing.

ENVIRONMENTAL HAZARDS

For terrestrial uses: Do not apply directly to water, or to areas where surface water is present or to intertidal areas below the mean high water mark. Do not contaminate water when disposing of equipment washwater or rinsate.

This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

Batch No:

Manufacturing Date:

Expiry Date:

PRODUCT OF INDIA

MANUFACTURED FOR

Agro Logistic Systems, Inc.

P.O. Box 5799, Diamond Bar, CA 91765,
U.S.A.

TEL: (714) 990-9220

Website: www.agrologistic.com

EPA REGISTRATION No. 70310-I

EPA ESTABLISHMENT No.070310-IND-
002

Sub-label A: Agriculture, Horticulture, Greenhouse, Golf Courses, Turf, Parks & Ornamentals

Debug®Trés

Emulsifiable Concentrate

Antifeedant, Insect Repellent,

Insecticide, Miticide, Fungicide & Nematicide



FOR ORGANIC PRODUCTION

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa 4.70%

Azadirachtin 3.00%

OTHER INGREDIENTS: 92.30%

TOTAL: 100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

KEEP OUT OF REACH OF CHILDREN CAUTION

FIRST AID

If on skin or clothing	Take off contaminated clothing.
	- Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air.
	- If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30AM to 4:30PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

Net contents: [4 Fl. Oz]/[8 Fl. Oz]/[32 Fl. Oz]/[1 Gal]

DIRECTIONS FOR

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

Do not apply this product in a way that will contact workers or other persons, either directly or through drift. Only protected handlers may be in the area during application. For any requirement specific to your State or Tribe, consult the State or Tribal agency responsible for pesticide regulation.

Refer to the attached booklet for the listing of crops and pests treated, dilution directions and application rates.

AGRICULTURAL USE REQUIREMENTS

Use this product only in accordance with its labeling and with the Worker Protection Standard 40 CFR part 170. This standard contains requirements for the protection of agricultural workers on farms, forests, nurseries, and greenhouses and handlers of agricultural pesticides. It contains requirements for training, decontamination, notification and emergency assistance. It also contains specific instructions and exceptions pertaining to the statements on this label about personnel protective equipment (PPE), notification to workers, and restricted-entry interval. The requirements in this box apply to uses of this product that are covered by the Worker Protection Standard.

Do not enter or allow worker entry into treated areas during the restricted entry interval (REI) of 4 hours. PPE required for early entry into treated areas that is permitted under the Worker Protection Standard and that involves contact with anything that has been treated such as plants, soil or water is:

- Coveralls
- Chemical resistant gloves, such as barrier laminates or butyl rubber or nitrile rubber or PVC.
- Shoes and socks

NON- AGRICULTURAL USE REQUIREMENTS

The requirements in this box apply to uses of this product that are NOT within the scope of the worker Protection Standard for agricultural pesticides (40 CFR Part 170). The WPS applies when this product is used on agricultural plants on farms, forests, nurseries, or greenhouses. Keep unprotected persons out of treated areas until sprays have dried.

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage and disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate. For Commercial Agricultural Use:

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Nonrefillable Container. Do not reuse or refill this container. Triple rinse (or equivalent) promptly and emptying. Triple rinse as follows: Empty the remaining contents into the application equipment or a mix tank and drain for 10 seconds after the flow begins to drip. Fill the container full with water and recap. Shake for 10 seconds. Pour rinsate into application equipment or a mix tank or store rinsate for later use or disposal. Drain for 10 seconds after the flow begins to drip. Repeat this procedure two more times. Then offer for recycling, if available, or puncture or dispose of in a sanitary landfill, or by incineration. Do not burn unless allowed by state and local ordinances.

DEBUG TRÉS
READ THE FOLLOWING INFORMATION
BEFORE USING DEBUG TRÉS

TANK MIXING:

DEBUG TRÉS is compatible with commonly used insecticides, fungicides and foliar fertilizers. Do not use Debug Trés with Bordeaux mixture, lime sulfur or other highly alkaline materials.

It is advisable to pre-test the tank mix combination proposed on a few plants to observe phytotoxicity, if any. The climatic conditions and cultural practices may be different in the actual field than experimental conditions. This product is damaged by oxidants. Do not mix acids and bleaches with **DEBUG TRÉS**.

MIXING DIRECTIONS:

1. Determine the acreage to be treated with **DEBUG TRÉS**.
2. Fill tank with appropriate amount of water.
3. Add the pre-measured amount of **DEBUG TRÉS**.
4. Keep tank agitated with an agitation device. Proper agitation is required, especially when mixing **DEBUG TRÉS** with other pesticides.

SPRAYING DIRECTIONS:

Spray **DEBUG TRÉS** using a boom system, propeller turbine system (indicated for orchards); pressure hose with gun sprayers, powered back sprayers and manual hand sprayers. Use a minimum boom pressure of 160 psi and maximum tractor speed of 2.0 miles per hour. Use horizontal nozzles at 10- inch spacing and two vertical drops, one at each end. Each vertical drop must have two nozzles, one at 90° angle and the other at 45° angle. The water used for mixing should have a pH at about 5.5 for **DEBUG TRÉS** to be most effective. If necessary, use a buffer to bring the pH to the desired level.

1. DURING APPLICATION, MAKE SURE THAT THE SPRAY COVERS THE ENTIRE PLANT INCLUDING THE UNDERSIDE OF LEAVES.
2. AERIAL APPLICATIONS: **DEBUG TRÉS** may be aerially applied using suitable equipment such as fixed-wing aircraft or helicopters

CHEMIGATION DIRECTIONS

GENERAL CHEMIGATION REQUIREMENTS:

- A. Apply this product only through sprinkler, or drip (trickle) irrigation systems. Do not apply this product through any other type of irrigation system.
- B. Crop Injury, lack of effectiveness, or illegal pesticide residues in the crop can result from non-uniform distribution of treated water.
- C. If you have questions about calibration, you should contact State Extension Service specialists, equipment manufacturers or other experts.
- D. Do not connect an irrigation system (including greenhouse systems) used for pesticide application to a public water system unless the pesticide label-prescribed safety devices for public water systems are in place.
- E. A person knowledgeable of the chemigation system and responsible for its operation or under the supervision of the responsible person, shall shut the system down and make necessary adjustments should the need arise.

SPRINKLER CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.

2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops. The irrigation line or water pump must include a functional pressure switch which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
5. Do not apply when wind speed favors drift beyond the area intended for treatment.
6. Agitation is generally recommended in the pesticide supply tank.
7. Apply this product continuously for the duration of the water application.
8. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
9. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

DRIP (TRICKLE) CHEMIGATION REQUIREMENTS:

1. The system must contain a functional check valve, vacuum relief valve, and low pressure drain appropriately located on the irrigation pipeline to prevent water source contamination from back flow.
2. The pesticide injection pipeline must contain a functional, automatic, quick-closing check valve to prevent the flow of fluid back toward the injection pump.
3. The pesticide injection pipeline must also contain a functional, normally closed, solenoid operated valve located on the intake side of the injection pump and connected to the system interlock to prevent fluid from being withdrawn from the supply tank when the irrigation system is either automatically or manually shut down.
4. The system must contain functional interlocking controls to automatically shut off the pesticide injection pump when the water pump motor stops.
5. The irrigation line or water pump must include a functional pressure switch, which will stop the water pump motor when the water pressure decreases to the point where pesticide distribution is adversely affected.
6. Systems must use a metering pump, such as a positive displacement injection pump (e.g. diaphragm pump) effectively designed and constructed of materials that are compatible with pesticides and capable of being fitted with a system interlock.
7. Agitation is generally recommended in the pesticide supply tank.
8. Apply this product continuously for the duration of the water application.
9. A supply tank is recommended for this product. If using a supply tank, dilute this product at the rate of 1.25 gallons per 500 gallons of water.
10. Apply between 1200 to 1500 gallons of water per acre to achieve efficacy.

For Golf Courses, Turf, Parks & Ornamentals
NEMATODE, AND TURF INSECT CONTROL

For Organic Turf Use. Controls many insects including: Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles, Leafhoppers, Fruit worms, Spider mites, Caterpillars, Cabbage loopers, Armyworms, Colorado potato beetles, Diamondback moths, Grasshoppers, Maggots, Weevils, Chafers, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii, Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium

DIRECTIONS FOR USE

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. SHAKE THIS CONTAINER WELL BEFORE USE.

2A. FOR NEMATODE CONTROL: (Ornamentals and Turf)

MIX 10 to 15 FL. OZ OF **DEBUG TRÉS** WITH 2 TO 30 GALLONS WATER TO SPRAY ON 1000 SQUARE FEET. Using sprinklers, deliver additional amounts of water to push the material to the required depth below ground level. Apply every week or as needed. Test the soil every month for nematode count. Repeat application if the nematode count is over the threshold limit.

2B. FOR INSECT AND WORM CONTROL (see above list):

MIX 0.3 to 0.6 FL. OZ. OF **DEBUG TRÉS** IN 2 TO 3 GALLONS OF WATER. 10 FL. OZ. to 22.5 FL. OZ. of Debug Trés with 100 gallons water per acre). Ensure that pH of this mixture is around 5.5 by using a buffer. Spray the mixture on to 1000 square feet of turf. Using sprinklers or other means, deliver additional amounts of water to push the material to ¼ inch - ½ inch below ground level. For worm and insect control apply at the earliest sign of infestation. Repeat the application at 7- 10 days interval if infestation persists.

3. SPRAY **DEBUG TRÉS IN THE EARLY MORNING OR LATE AFTERNOON.**

4. USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.

5. USE AS A PREVENTATIVE TO KEEP INSECTS AWAY.

GENERAL:

- **DEBUG TRÉS** is more effective when used as a preventative.
- **DEBUG TRÉS** is a broad-spectrum herbicide insecticide.
- **DEBUG TRÉS** affects the insects at all stages of growth.
- SHAKE THE CONTAINER WELL, BEFORE USE.
- IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION.

WARRANTY:

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's intention that the buyer assumes risk of use, storage or handling of this material not in strict accordance with directions given herein.

CROPS

Top fruits such as Citrus, Lemons, Oranges, Grapefruits, Pummalo, Apples, Plums, Peaches, Apricots, Avocados, Figs, Prunes, Nectarines, Pears. Mangoes, Cherries, Kiwifruit, Kumquats, Loquats, Quinces, Persimmons, and Palm.

Cucurbits, Watermelons, Gherkins, Squashes, Pumpkins, Gourds, Bitter melons, Chayote, Okra, Asparagus, and Melons.

Bulb, Cole and Leafy vegetables such as Broccoli, Brussels sprouts, Cabbage, Celery, Lettuce, Endives, Kale, Parsley, Onions, Garlic, Shallots, Leeks, Kohlrabi, Chard, Collard, Amaranth, and Spinach.

Root and Tuber vegetables such as Beets, Carrots, Ginger, Radish, Horseradish, Potatoes, Turnips, Yams, Sweet Potatoes, Ginseng, Rutabagas, Watercress, Artichokes and Turmeric.

Legumes such as Beans, Lentils, Peas, Peanuts, Soybeans and Garbanzo Beans.

Cereals such as Barley, Corn, Millet, Rice, Rye, Sorghum, Triticale, Oats, and Wheat.

Alfalfa and other feed & forage crops. Grasses

Fruiting vegetables such as Tomatoes, Tomatillos, Bell Peppers, Chili Peppers, and Eggplant.

Berries such as, Blackberries, Blueberries, Currants, Strawberries, Cane berries, Gooseberries, Raspberries, Cranberries, Loganberries, Huckleberries, and Boysenberries

Grapes

Tropical fruits such as Banana, Cherimoyas, Mangoes, Guavas, Papayas and Pineapple.

Cotton and oilseeds such as Canola, Sesame, Rapeseed, Sunflower, Safflower, Olive, Peanut and Jojoba

Herbs & Spices including but not limited to Mints, Anise, Basil, Chives, Coriander, Dill, Fennel, Marigold, Sage, and Thyme.

Mushrooms, such as: Agaricus, Bella, Enoki, Maitake, Oyster, Shitake, and other specialty mushrooms

Nuts such as Almonds, Pecans, Pistachios, Cashews, Chestnuts, Macadamia, Hazelnuts, Brazil nut, Water chestnuts, and Walnuts.

Coffee, Tea, Tobacco and Sugarcane.

Greenhouse Crops including ornamentals such as Chrysanthemums, Poinsettias, Roses, Lilies, Geraniums, Daisies, Carnations, Salvias and Dahlias.

All starter vegetables and fruit crops.

INSECT

PESTS/MITES/DISEASES/NEMATODES

Aphids

Armyworms

Fall Armyworms

Beetles, Beanleaf Beetles, Cucumber Beetles, Japanese Beetles, Mexican Beetles, Colorado Potato Beetles, Potato Flea Beetles, Corn beetles, Flea Beetles

Borers, Budworms.

Casebearers, Caterpillars, Codling Moth

Fruit Flies

Gnats, Fungus Gnats, Grasshoppers, Grubs

Leaf Hoppers, Leaf Perforators, Leafminers, Leafrollers, Loopers, Cabbage loopers, Lygus Bug

Maggots, Onion Maggots, Mealy Bugs, Mealybugs, Mildew, Rust and Powdery Mildew, Mites, Two Spotted Spidermites, Pacific Spider Mites, Moths, Diamondback Moths, Gypsy Moths, Grape Berry Moths, Nematodes

Orange Totrix

Phylloxera, Phythium, Psylla, Psyllids

Rhizoctonia Solani

Scales, San Jose Scale

Sclerotinia Sclerotiorum

Sclerotium Rolfsii

Sharpshooters

Sucker Ants

Thrips

Weevils, Pepper Weevils, Boll weevils

Whiteflies

Worms

Wireworms

Webworms

Budworms

Alfalfa Worms

Boll Worms

Pickle Worms

Fagot Worms, Root Worms, Ear Worms, Cut Worms

DIRECTIONS FOR CROP APPLICATIONS

PREVENTATIVE APPLICATION: APPLICATION RATES ARE FOR ONE ACRE EXCEPT AS NOTED.

As a preventative application mix 4 to 8 Fl. Oz. of Debug Trés in 50 to 100 gallons water or sufficient amount of water to ensure total foliar coverage. Start applying when the plants are tall enough to be susceptible to infestation. Use the following:

- For **Baby Vegetables**, apply 10 days after planting and repeat again in 7 to 10 days.
- For **Regular Vegetables**, apply when the plant has grown two leaves or is 6 inches tall. Repeat application every 10 to 15 days.
- For **Fruit Trees**, apply when the tree ends dormancy and continue to repeat applications every 10 to 15 days.
(For fruit trees use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water)
- For **Berries**, apply when the plant ends dormancy and continue to repeat applications every 10 to 15 days.
(For berries use 3 to 5 Fl. Oz. of Debug Trés in 150 gallons of water).
- For **Grasses and Forage Crops like Alfalfa**, apply in spring, approximately 2 weeks after dormancy period is over, and repeat every 10 to 15 days.

STANDARD APPLICATION : ALL APPLICATION RATES ARE FOR ONE ACRE

5 Fl. Oz. to 15 Fl. Oz. of Debug Trés mixed with 100 gallons water or sufficient amount of water to ensure total foliar coverage. When applying at early plant stage use dilution of 5 fl. Oz. to 10 fl. Oz. of Debug Trés with 50 gallons of water. When applying in high population crops like berries and fruit trees, use dilution of 12 Fl. Oz. to 22.5 Fl. Oz. of Debug Tres with 150 to 300 gallons of water.

Repeat application at 7 to 14 day intervals, at least once and if necessary additional times.

For Greenhouse crops Prepare a 0.5% - 0.75% (0.50 oz – 1.0 oz./ Gal) solution of Debug Trés in water and completely drench the plants. Repeat every 5 to 7 days till infestation clears.

For NEMATODE CONTROL use 12 oz to 22.5 oz. Debug Trés in 500- 1500 Gallons water per acre as a drench or drip. Repeat applications at the same rate as needed.

MAXIMUM APPLICATION RATE IS 20 GRAMS OF ACTIVE INGREDIENT (22.5 FL. OZ. OF DEBUG TRÉS E.C.) OR LESS PER ACRE ACCORDING TO TOLERANCE EXEMPTION 40 CFR 180.1119 FOR AZADIRACHTIN. FATS, AND GLYCERIDIC OILS MARGOSA (NEEM OIL) IS EXEMPT FROM THE REQUIREMENT OF A TOLERANCE AS PER 40 CFR 180.1291

Agro Logistic Systems, Inc.
P.O.Box: 5799
Diamond Bar, CA 91765, U.S.A.
TEL: (714) 990-9220; FAX: (714) 990-9222
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 website: www.agrologistic.com
EPA REGISTRATION NO: 70310-I
EPA ESTABLISHMENT NO: 070310-IND-002

Sub-label B: For Home Gardens

Debug®Trés

For Indoor and Outdoor Use
For Organic Gardening

From the Neem Tree

**Ideal for Flower Beds, Vegetable Gardens, Lawns & Fruit Trees
Including indoor and outdoor plants grown in containers.**

Antifeedant, Insect Repellent, Insecticide, Miticide, Fungicide & Nematicide

Controls many insects including:

Red ants, Cutworms, Grubs, Chinch bugs, Crickets, Aphids, Whiteflies, Thrips, Beetles,
Leafhoppers, Fruit worms, Spider mites, Caterpillars, loopers, Armyworms, Grasshoppers,
Maggots, Weevils, Spider Mites, spittlebugs, Webworms, Rhizoctonia solani, Sclerotium rolfsii,
Sclerotinia sclerotiorum, Fusarium oxysporum, Rust, and Powdery Mildew, Pythium etc.

KEEP OUT OF REACH OF CHILDREN

CAUTION

FIRST AID

If on skin or clothing	Take off contaminated clothing. - Rinse skin immediately with plenty of water for 15-20 minutes - Call a poison control center or doctor for treatment advice.
If inhaled	-- Move person to fresh air. - If person is not breathing call 911 or an ambulance, then give artificial respiration, preferably mouth to mouth if possible. - Call a poison control center or doctor for further treatment advice

HOT LINE NUMBER

Have the product container or label with you when calling a poison control center or doctor, or going for treatment. For emergency information concerning this product, call the National Pesticides Information Center (NPIC) at 1-800-858-7378 seven days a week, 6:30 AM to 4:30 PM Pacific Time (NPIC Web Site: www.npic.orst.edu).

SEE OTHER PANEL FOR PRECAUTIONARY STATEMENTS

ACTIVE INGREDIENT:

Fats and Glyceridic

Oils Margosa

4.70%

Azadirachtin

3.00%

OTHER INGREDIENTS:

92.30%

TOTAL:

100.00%

0.61 LBS (272 GRAMS) ACTIVE INGREDIENT PER GALLON OF PRODUCT

Net contents: [0.16 Fl. Oz]/[1 Fl. Oz]/[4 Fl. Oz]/[8 Fl. Oz]/[16 Fl. Oz]/[24 Fl. Oz]/[32 Fl. Oz]

A REGISTRATION No. 70310-I
EPA ESTABLISHMENT No. 070310-IND-002

Manufactured for:
Agro Logistic Systems, Inc.
P.O. Box 5799
Diamond Bar, CA 91765, U.S.A.
Tel: (714) 990-9220

PLEASE REFER TO THE FRONT PANEL FOR FIRST AID INSTRUCTIONS
PRECAUTIONARY STATEMENTS

HAZARDS TO HUMANS AND DOMESTIC ANIMALS

harmful if absorbed through skin or if inhaled. Causes moderate eye irritation. Avoid breathing spray. Avoid contact with skin, eyes or clothing. Wash thoroughly with soap and water after handling and before eating, drinking, chewing gum, using tobacco or using the toilet. Remove and wash contaminated clothing before reuse.

Personal Protective Equipment (PPE) required for this product are long-sleeve shirt and long pants, socks, shoes, and chemical resistant gloves.

ENVIRONMENTAL HAZARDS

To protect the environment, do not allow pesticide to enter or run off into storm drains, drainage ditches, gutters or surface waters. Applying this product in calm weather when rain is not predicted for the next 24 hours will help to ensure that wind or rain does not blow or wash pesticide off the treatment area. Rinsing application equipment over the treated area will help avoid run off to water bodies or drainage systems. This product is toxic to fish and aquatic invertebrates. Drift or runoff may be hazardous to aquatic organisms in water adjacent to treated areas.

Combustible. Do not use or store near heat or open flame.

DIRECTIONS FOR USE:

It is a violation of Federal Law to use this product in a manner inconsistent with its labeling.

1. **SHAKE THIS CONTAINER WELL BEFORE USE.**
2. **MIX 5 ML to 10 ML (1 to 2 TEASPOONS) OF DEBUG TRÉS WITH 24 TO 32 FL. OZ. WATER IN A SPRAY CONTAINER. SHAKE WELL.**
3. **SPRAY THE MIXTURE ON THE LEAVES AND STEMS, INCLUDING THE UNDERSIDE OF LEAVES SO AS TO COMPLETELY DRENCH THE PLANT.**
4. **SPRAY DEBUG TRES EARLY IN THE MORNING OR LATE AFTERNOON.**
5. **USE ALL OF THE DILUTED MATERIAL SOON AFTER MIXING. DO NOT SAVE MIXED MATERIAL.**
6. **FOR BEST RESULTS, APPLY WEEKLY (OR MORE FREQUENTLY IF INFESTATION PERSISTS).**
7. **USE AS PREVENTATIVE TO KEEP INSECTS AWAY.**
8. **DO NOT WASH THE LEAVES FOR 24 HOURS AFTER SPRAYING.**
9. **FOR LAWN CARE, APPLY 10 ml (2 TEASPOONS) TO 20 ml (4 TEASPOONS) OR LESS OF CONCENTRATE PER 100 SQ. FT. PER APPLICATION.**
10. **IF GELLING OCCURS, WARM IT TO ROOM TEMPERATURE BEFORE APPLICATION**

STORAGE AND DISPOSAL

Do not contaminate water, food, or feed by storage or disposal.

PESTICIDE STORAGE: Keep in original packaging in cool and dry place away from sunlight and foodstuffs. Do not refrigerate.

PESTICIDE DISPOSAL: Wastes resulting from the use of this product may be disposed of on site or at an approved waste disposal facility.

CONTAINER HANDLING: Non-refillable container. Do not reuse or refill this container. **If empty:** Place in trash or offer for recycling if available. **If partly filled:** Call your local solid waste agency or [1-800-CLEANUP] for disposal instructions. Never place unused product down any indoor or outdoor drain.

WARRANTY STATEMENT

AGRO LOGISTIC SYSTEMS, INC. warrants that material contained herein conforms to the description on the label and is reasonably useful for the purposes referred to in the directions for use. Method of application and timing, weather, cultural practices, insect problem, crop condition, and incompatibility with other chemicals not specifically recommended in the use of this product are beyond the control of the seller. It is the manufacturer's attention that the buyer assumes risk of use, storage, or handling of this material not in strict accordance with directions given herein.

Manufacturing Date:
Expiry Date:

Product of India

